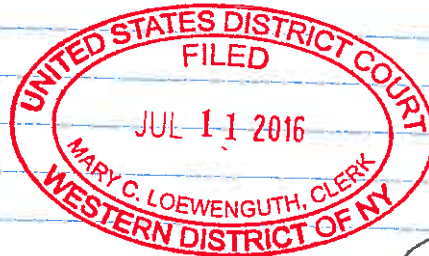


UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CARLOS ABREU

Plaintiff

V.S



AMENDED
COMPLAINT

KEVIN J. BROWN (DSS) (w/ndc)
ROBERT HAMILTON (C.O) (w/ndc)
EDWARD MEYER (CAPT) (w/ndc)
JEFFREY KEENAN (L.T) (w/ndc)
MICHAEL LUCAS (LT) (w/ndc)
JACK MEARA (SGT) (w/ndc)
DONVILLE HODGES (SGT) (w/ndc)
JOHN LEMPKE (SPT) (w/ndc)
ELIZABETH BLAKE (INSTITUTION STAFF) (w/ndc)
MICHELLE AMBRASOLI (NURSE ADMINISTRATOR) (w/ndc)
PAULA BOZER (PHYSICIAN/DOCTOR) (w/ndc)
ROSALYN KILLINGER (DEPUTY SPT FOR HEALTH) (w/ndc)
ALFREDO KUA (PHYSICIAN/DOCTOR) (w/ndc)
STANLEY BUKOWSKI (PHYSICIAN/DOCTOR) (w/ndc)
NICOLE FINK (OCCUPATIONAL THERAPIST) (w/ndc)
EILEEN FUCINA (NURSE ADMINISTRATOR) (w/ndc)
STEVEN FURLONI (EDUCATION SUPERVISOR) (w/ndc)
SARAH GODFREY (PHYSICAL THERAPIST) (w/ndc)
TIMOTHY GORNY (NUTRITIONAL ADMINISTRATOR) (w/ndc)
JOEL GRODEN (SENIOR LIBRARIAN) (w/ndc)
NICOLE HEARY (DOCS HEARING OFFICER) (w/ndc)
MICHAEL A HILL (ASSISTANT DSP/PREA COM. (w/ndc)
SCOTT LEUTHE (MEDICAL NURSE PRACTITIONER) (w/ndc)
JACQUELINE LEVITT (FACILITY HEALTH SERVICE DIRECTOR) (w/ndc)
LESLIE LISSON (OMH SOCIAL WORKER) (w/ndc)
DANIELLE PARKER (PHYSICAL THERAPY ASSISTANT) (w/ndc)
JENNIFER RIVERA (OMH SOCIAL WORKER) (w/ndc)
JENIFER HAGGERTY (OMH SOCIAL WORKER) (w/ndc)
ARNOLD ROBINSON (OMH NURSE ADMINISTRATOR) (w/ndc)
MR. BOOBE (SGT) (MCF) #111

CIVIL NO.
14-CV-6599

JURY TRIAL
DEMANDED

J. WESTON (CORRECTION OFFICER AT GREAT HADDON)
BRYAN HILTON (ASSISTANT COMMISSIONER) (DOCS ALBANY)
MS. REDDING (NURSE OF INFECTIOUS DISEASE) (DOCS ALBANY)
JILL GRANT (RISK MANAGEMENT SPECIAL) (OMH/UNDA HADDON)
MR J. IVES (OMH CLINICIAN AT GREAT HADDON/GMCF)
MS PAL (OMH PSYCHIATRIST AT GMCF)
MR JACKSON (OMH UNIT CHIEF AT GMCF)
ALBERT PAOLANO (DOCS PHYSICIAN/DOCTOR AT GMCF)
DAVID KARANDY (FACILITY HEALTH SERVICE DIRECTOR/GMCF)
MR THOMAS (FIRST DEPUTY SUPERINTENDENT AT GMCF)
KEVIN P. BRUN (DEPUTY COMM. COUNSEL DOCS ALBANY)
C. BASCUL (SHU SERGEANT AT GMCF)
JEFFREY NABOZNY (CAPTAIN AT GMCF)
MICHAEL LYONS (OMH SERGEANT AT GMCF)
MR. DEPOLO (CAPTAIN AT GMCF)
MICHAEL GONYEA (CORRECTION OFFICER AT GMCF)
P. MELEGIO (DEPUTY SUPERINTENDENT HR PROGRAM/GMCF)
R.D. EASTMAN (DEPUTY SUPERINTENDENT OF SECURITY/GMCF)
C. MILLER (SUPERINTENDENT AT GMCF)
MR. CLEVELAND (CAPTAIN AT GMCF)
MARI HARRIS (NURSE ADMINISTRATOR AT GMCF)
CARL J. KORNIGSMANN (CHIEF DOCTOR AT DOCS ALBANY)
CARRICK N. JACKSON (OMH UNIT CHIEF/SULLIVAN C.F.)
MS COLLINS (ASSISTANT OF DSP & MENTAL HEALTH) (GMCF)
L.T. WILLIAMS (LIEUTENANT AT GMCF)
L.T. BIRRELL (LIEUTENANT AT GMCF)
L.T. SCANLON (LIEUTENANT AT GMCF)
L.T. VLADYKOV (LIEUTENANT AT GMCF)
Sgt. R. LOWRY (SERGEANT AT GMCF)
Sgt. J. BYERS (SERGEANT AT GMCF)
Sgt. S. LEONARD (SERGEANT AT GMCF)
Rabbi MR. KELLMAN (Rabbi AT GMCF)
MS. PRACOCK (DEPUTY Supt ADMINISTRATION) (GMCF)
EDWARD BURNETT (DEPUTY Supt SECURITY) (SULLIVAN C.F.)
WILLIAM F. KEYSER (SUPERINTENDENT AT) (SULLIVAN C.F.)
GAIL WILLIAMS (DEPUTY Supt ADMINISTRATION) (SULLIVAN C.F.)
JAN SZABLICK (CORRECTION OFFICER AT) (WANDER C.F.)
PATRICK CONNOLLY (SERGEANT AT WANDER C.F.)
LARRY WYZYKOWSKI (OPTICIAN AT WANDER C.F.)
LAURA JOWA (LIEUTENANT AT WANDER C.F.)
LESLIE LISSON (OMH CLINICIAN AT WANDER C.F. SHU)
MS. BOALL (ON INV.) (DOCS ALBANY) # (2)

J. TELESKO (Lieutenant at Great Meadow)
C. Boice (medical nurse at Great Meadow)
Sgt Evans (Sergeant at Windle CF)
Brian Freeman (Sergeant at Windle CF)
Paul Reid (Correction Officer at Windle CF)
Joyce Krygier (Officer of Full Report/Windle CF)
Michael Herbinson (Correction Officer/Windle CF)
Henry Magyar (Correction Officer/Windle CF)
William Gregoire (Sergeant at Windle CF)
Michael Lucas (Lieutenant at Windle CF)
Mary Geary (Medical Nurse at Windle CF)
Cindy Ferron (Inmate Grievance Supervisor/Windle CF)
Jeffrey Helf (Counselor Supervisor at Windle CF)
Lisa La Penina (Medical Nurse at Windle CF)
Tamara Davis (Medical Nurse at Windle CF)
Randall Labedz (Lieutenant at Windle CF)
Marylisa Hayden (Medical Nurse at Windle CF)
Jeff McCoy (Deputy Commissioner Program/^{DOCS} Albany)
Debra Menning (Risk Management Specialist (^{DOCS} ONYDC))
Maurleen Bosco (Executive Director OMH/CNYPC MORCV)
Kevin Rospick (Correction Officer at Windle CF)
K. Lipka (Medical Nurse at Great Meadow CF)
S. Havens (Medical Nurse at Great Meadow CF)
M. Rogul (Medical Nurse at Great Meadow CF)
L. LaFresch (Medical Nurse at Great Meadow CF)
P. Pink (Psychiatric Nurse of OMH at GMCF)
R. LeClaire (Psychiatric Nurse of OMH at GMCF)
R. Brunelle (Medical Nurse at Great Meadow CF)
M. Van Order (Medical Nurse at GMCF)
C. Watkins (Medical Nurse at GMCF)
Ann Marie T. Sullivan (OMH Commissioner Albany)
Deborah J. McCulloch (Executive Director CNYPC)
MEAGHAN BERNSTEIN (Risk Management Specialist/^{DOCS} ONYDC)
JASON D. EFFMAN (Associate Assistant (^{DOCS} ONYDC - Albany))
Megan Yaiser (DOCS Regional Health Services Admin (Albany))
Ms Yune (Dentist/DR at Great Meadow)
Linda Holmen (Education Director at DOCS Albany)
Richard Montes (Chairman Office Language at DOCS Albany)
Alexandra KUILAN (Inmate Grievance Supervisor/GMCF)
 NEW YORK STATE
 N.Y.S. OMH AND N.Y.S. DOCS
 DEFENDANTS.

CHERYL MORRIS (DIRECTOR MINISTERIAL (DOCS ALBANY)
 RICHARD MONTER, CHAIRMAN (DOCS OFFICE LONGHOLE ALBANY)
 MARY J. D'SILVA DIRECTOR OF DENTAL SERVICES (DOCS ALBANY)
 H. MCCARTHY (OMH SOCIAL WORKER / GREAT MEADOW CF)
 J. WINNEY (DOCS COUNSELOR / ORC AT GREAT MEADOW)
 CHIEF OF SPECIAL INVESTIGATION / INSPECTOR GENERAL / DOCS ALBANY
 JESAN SCHUMACHER (DEPUTY SUPERINTENDENT ADMINISTRATION / WENDE)
 MARGARET STIRK (UNIT CHIEF OF OMH AT WENDE CF)
 DEBRA STUBBUZE (PHYSICIAN / DOCTOR AT WENDE CF)
 TAD ADAMS (ACTING DIRECTOR OF RISK MANAGEMENT / OMH / CNTPC)
 DIANE TOPOREK (MEDICAL NURSE ADMINISTRATOR / WENDE CF)
 DENNIS WAHR (PHYSICIAN THERAPIST AT WENDE CF)
 STEPHANIE ROMAN (CORRECTION OFFICER AT WENDE CF)
 ROBERT SKUBIS (SHU COUNSELOR AT WENDE CF)
 JEFFREY MAYER (CORRECTION OFFICER AT WENDE CF)
 M. HAWK (SERGEANT AT GREAT MEADOW CF)
 DARRIN MCGUIRE (LIEUTENANT AT WENDE CF)
 ALAN HERAZIK (LIEUTENANT AT WENDE CF)
 TAYLOR ROBERTS (SERGEANT AT WENDE COAR, FAC)
 K. WHITE (FOIL OFFICER AT GREAT MEADOW CF)
 LATASHA JOHNSON (CORRECTION OFFICER AT WENDE CF)
 TED JENTZ (CORRECTION OFFICER AT WENDE CF)
 DEAN MORRIS (SERGEANT AT WENDE CF)
 LEWIS URBAN (SUPERVISOR COUNSELOR AT WENDE)
 SERGIO VASQUEZ (CORRECTION COUNSELOR AT WENDE)
 DIRECTOR OF NURSES NEAL (AT WENDE CF)
 MR S. SIMMONS (CORRECTION OFFICER AT WENDE)
 B. WILSON (LOW LIBRARY OFFICER SUPERVISOR / WENDE)
 STEPHEN ASH (REGIONAL HEALTH SERVICES ADMINISTRATOR (ALBANY DOCS))
 MR VOHMER (MEDICAL NURSE AT WENDE CF)
 SHAWN HYLAND (CORRECTION OFFICER) (AT WENDE CF)
 ALBERT PRACK (SHU DIRECTOR AT DOCS ALBANY)
 D. VNETTOZZI (SHU DIRECTOR AT DOCS ALBANY)
 KAREN CROWLEY (DEPUTY SUPERINTENDENT PROGRAM (WENDE))
 KOREN BELLAMY (DIRECTOR OF GRIEVANCE PROGRAM (WENDE))
 J. HALE (ASSISTANT DIRECTOR OF GRIEVANCE PROGRAM (WENDE))
 NANCY J. HEYWOOD (ASSISTANT OF DEPUTY COMM. COUNSEL OFFICE / ALBANY)
 J. ARLISS (HAND SPECIALIST / ORTHOPEDIST AT SULLIVAN CF)
 MARIA DIOZ (PHYSICIAN ASSISTANT AT SULLIVAN CF)
 GINGER EGGIER (NURSE ADMINISTRATOR AT SULLIVAN CF)
 WLADYSLAW SIDOROWICZ (FOI / HEALTH SERVICE DIRECTOR / SULLIVAN)
 P. SULLIVAN (LOW LIBRARY OFFICER AT GREAT MEADOW CF)

- 1) All The Defendants Have acted AND CONTINUE TO ACT UNDER COLOR OF STATE LAW AT ALL TIMES RELEVANT TO THIS COMPLAINT.
- 2) All Defendants ARE DOCS AND OMH STAFF OFFICIALS EMPLOYED AND PERSONNEL AND THEY ARE SUED IN THEIR INDIVIDUAL CAPACITIES.
- 3) THE DEFENDANTS NEW YORK STATE THE DEPARTMENT OF CORRECTIONS AND COMMUNITY SUPERVISION (DOCS) AND THE OFFICE OF MENTAL HEALTH (OMH) ARE PARTS OF THE UNITED STATES OF NORTHERN AMERICA, AND THEY ARE SUED IN THEIR INDIVIDUAL AND OFFICIAL POSITIONS.
- 4) THE PLAINTIFF CHARLES ABREU ('ABREU OR PLAINTIFF') IS A PRISONER IN THE STATE OF NEW YORK IN THE CUSTODY OF THE N.Y.S. DOCS AND N.Y.S. OMH. STATES UPON PERSONAL KNOWLEDGES AS TO HIS ACTION AND UPON INFORMATION AND BELIEF AS TO THE ACTIONS OF OTHERS AS FOLLOWS FOR HIS COMPLAINT AGAINST THE DEFENDANTS IN THIS ACTION.

PRELIMINARY STATEMENT

- 5) This is a civil action for damages for matters occurring while Plaintiff was incarcerated at Wende Correctional Facility Sullivan Correctional Facility AND GREAT MEADOW CORRECTIONAL FACILITY ('WENDE SULLIVAN AND GREAT MEADOW') -

— UNDER 42 U.S.C. § 1983 ALLEGING, INTER ALIA DELIBERATE INDIFFERENCE TO PLAINTIFF'S MEDICAL AND MENTAL HEALTH NEEDS IN VIOLATION OF THE EIGHTH AND FOURTEENTH AMENDMENTS; PHYSICAL AND PSYCHOLOGICAL ABUSE; VIOLATION OF PLAINTIFF'S FOURTEENTH AMENDMENT EQUAL PROTECTION RIGHTS ROOTED IN DISCRIMINATION BASED ON HIS MENTAL ILLNESS RACE AND ETHNICITY; VIOLATION OF PLAINTIFF'S FIRST AMENDMENT RIGHT TO RELIGIOUS MEANS ACCESS TO THE LAW LIBRARY, ACCESS TO THE COURT, AND ACCESS TO READING MATERIALS LAW BOOKS LEGAL MATERIALS PAPERS AND LEGAL DOCUMENTS. PLAINTIFF ALSO ALLEGES UNJUSTIFIED, EXCESSIVE AND IMPROPER USE OF FORCE SEXUAL ABUSE SEXUAL ASSAULTS AND SEXUAL HARASSMENTS BY NUMEROUS DEFENDANTS, WHO HAS ALSO CONSPIRED AND RETALIATED AGAINST PLAINTIFF WHILE PLAINTIFF WAS CONFINED IN THE SPECIAL HOUSING UNIT (SHU) AND MENTAL HEALTH UNIT (MHU) AT WENDE SULLIVAN AND GREAT MEADOW CORRECTIONAL FACILITIES.

" JURISDICTION "

6) THIS IS A CIVIL ACTION AUTHORIZED BY 42 U.S.C. § 1983 TO REDRESS THE DEPRIVATIONS AND ASSAULTS LISTED ABOVE, UNDER COLOR OF STATE LAW AND RIGHTS SECURED BY THE CONSTITUTION OF THE UNITED STATES. THE COURT HAS JURISDICTION OVER THE PLAINTIFF'S CLAIM UNDER 28 USC §§ 1331 1343(3), AND (4) AND 2201, AND UNDER FED. CIV. P. 18 § 20(a)

7) THE COURT HAS SUPPLEMENTAL JURISDICTION — OVER THE PLAINTIFF'S STATE LAW CLAIMS UNDER —

- 28 USC § 1367, AND THE COURT HAS JURISDICTIONS TO HEAR JOINDERED CLAIMS & DEFENDANTS UNDER FED. R. CIV. P. 18 & 20(a).

VENUE

- 8) Venue is PROPER PURSUANT TO 28 USC § 1391 (b).

FACTS

- 9) ON OR ABOUT JULY 15/2014 ABREU WAS TRANSFERRED TO WYANDOTTE CF SITU. FROM AUBURN CF SITU (BOX TO BOX TRANSFER).
- 10) ABREU ARRIVED TO WYANDOTTE SITU WITH A MEDICAL PRESCRIBED MEDICATIONS AND MEDICINES OF LIPITOR / ATORVASTATIN FOR HIGH CHOLESTEROL. CLORIVIN FOR ALLERGY AND NABUMETONE FOR HIS PAIN PROBLEMS. HE ALSO HAS A PRESCRIBED ASTHMA INHALER FOR HIS ASTHMA PROBLEMS.
- 11) ABREU WAS TESTED IN AUBURN CF SITU FOR TUBERCULOSIS AND ON OR ABOUT JULY 09/2014 ~~THE TEST~~ CAME POSITIVE (T.B. POSITIVE) AND ABREU WAS IMMEDIATELY PLACED IN T.B. MEDS. FOR TO BE TAKE FOR NINE (9) STRAIGHT MONTHS. (PRESCRIBED FOR NINE STRAIGHT MONTHS) OR FOR ONE YEAR / 12 MONTHS / STRAIGHTS.
- 12) THE T.B. MEDICATIONS CONSIST OF INHA 900MG AND B6. VITAMINS FOR AVOID THAT THE T.B. GET ACTIVE. ABREU WAS SUPPOSED TO TAKEN THE MEDS TWICE (two/2) TO THE WEEK, DELIVERED BY A MEDICAL NURSE(S).

13) ON July 17/2014 a second TEST (T.B. TEST) was conducted in WINDLE C.F. SITE. Again because the Defendant Doctor Levitt didn't believe the first TB test taken in Auburn C.F. SITE. However the test was again positive so the QUANTIFERON came TB positive and the DR. LEVITT. SPOKE WITH THE DEFENDANT DR. KOENIGSMANN in Central Office Albany / DOCS EXPLAINED TO HIM THE PROBLEMS THEN THE T.B. MEDS. WERE AGAIN APPROVED AND DR. LEVITT AGREED TO RE-PRESCRIBE THE T.B. MEDS. AFTER SEVERAL DAYS DENIED ABREU HIS T.B. MEDICATIONS.

14) THE DEFENDANTS DR. LEVITT THE DR. BOZER THE DR. BUKOWSKI THE NURSE PRACTITIONER LEUTHE THE NURSE ADMINISTRATOR FUCINA THE DR. STUBESZ THE NURSE ADMINISTRATOR TOPOREK THE NURSE PRACTITIONER OBERTAN THE MEDICAL NURSE MR. VOLLMER THE MEDICAL NURSE LA PENNA THE MEDICAL NURSE TOMORA DAVIS THE DIRECTOR OF NURSE NEAL AND DEPUTY SUPERINTENDENT FOR HEALTH SERVICES AT WINDLE C.F. THEY REFUSED INTENTIONALLY AND IN BAD FAITH DENIED MR. MEDICAL CARE TO ABREU MEDICAL CONDITIONS, DENIED ABREU HIS MEDICATIONS, DENIED HIM REGULARLY SICK CALL SERVICES, DENIED HIM HIS T.B. MEDS. DENIED HIM HIS ASTHMA INHALER HIS LIPITOR AND / OR CLORIVIN MEDS., REFUSED TO RE-PRESCRIBE HIS ORTHOPEDIC BOOTS BACK BRACE HAND BRACE DENIED TO MR. ABREU TREATMENTS FOR HIS CHRONIC PAINS IN LOWER BACK HORN LEFT ANKLE / FOOT AND TREATMENTS FOR HIS BLEEDING AND PAIN IN HIS ANUS RECTAL / STOMACH

15) The Defendant DR Levitt She is the Facility Health Service Director at Wanda CH AND she alleged AND TOLD me that she was Directed AND ORDERED by the Deputy Superintendent for Administration Ms. Schumacher. The Deputy Superintendent for Health Services. Mr Killinger, the Superintendent Lemke; AND DR Kornigsmann, Don't give Abreu nothing, OR limited medical Health care because 'Abreu has two (2) Pending lawsuits in the Western District Court, where the Superintendent Lemke is a defendant along with DR Kornigsmann AND other Docs officials. ALSO she alleged that the Council Office AND the N.Y.S. Attorney General Office has recommended AND ORDERED to do so.

16) in fact the Defendant DR. Levitt has written an Affidavit against Abreu, about AND Regarding to the Pending Lawsuits in the Western District Court in Abreu v. Farley Docket NO. 11CV6251 Consolidated with Abreu v. Contreras the which she gave it to the N.Y.S. Attorney General Assistant Mr. Hillet Deutsch. So this is very clear, there is a Conspiracy AND Retaliation against Mr Abreu AND a deliberate interference to his medical needs, care, safety, well being, welfare, AND Health.

17) The Defendant Ms Killinger gave to Mr Abreu a similar Response that all this came from Docs officials DR Kornigsmann AND the Attorney General Office, the Docs Council Office Ms. Heywood, AND Mr Brinier, who is also a defendant, in Farley v.

18) The Defendants Levitt And The Other Medical Defendants Started And They Continued With Their Open Misconducts And Violations Of My Rights From July/2014 To April/2015 because in April 2015 Mr Abreu Was Transferred To Sullivan C

19) The Defendants Levitt And Wyzikowski Also Denied Abreu His Prescribed Eye Glasses With Photo Ray / Tinted Lenses That Mr Abreu Was In Need. And That Were Missing And Lost By Prison Officers In The SHU. Mr Abreu Was Suffering Of Strong Headaches Double visions Unable Can Read Well Unable Can To Focus Objects Pains In Both Eyes Due To The Light And Sun Light but they also Ignored Abreu Complaints And Conditions Even Abreu Showed To They Documentary Evidence That He Is Injured To Receive Such Lenses.

20) The Defendants Nicole Fink And Godfrey Were Denied Abreu Physical Therapy And Occupational Therapy The Which Abreu Was In Need. Mr Abreu Had A Hand Surgery In March/2014 Due To A Broken Hand. And Abreu, Has Also Diagnosed With 'Suffering Of' Carpal Tunnel Syndrome, And The Dr/Surgeon Who Has Conducted The Hand Surgery In March/2014 Has Recommended And / Or Ordered Pain Medications Physical Therapy And A Hand brace, but The Defendants Fink Godfrey Levitt And Killinger Has Failed Or / And Refused To Follow The Recommendations Directions / Or Orders & Prescriptions Or The Surgeon / Orthopedist, And Specialists And Doctors From Out Side Hospital And From Other Correctional Facilities.

21) The Defendants Jennifer Rivera - Jennifer Haggerty, Leslie Litson, AND MARGARET STIRK were denied Abreu OPENLY MENTAL HEALTH CARE AND they were denied Abreu his MENTAL HEALTH / PSYCHIATRIC MEDS, REFUSED TO STOP ABUSE MR Abreu CELL IN THE SHU, REFUSED TO TALK WITH MR Abreu, REFUSED PRIVACY MENTAL HEALTH INTERVIEW WITH MR Abreu, WRITING MULTIPLE FALSE TICKETS TO MR Abreu IN REVOLUTIONS FOR his MULTIPLE GRIEVANCES AND COMPLAINTS AGAINST THEM AND DOCS AND OMH STAFF AND OFFICIALS AND THEY ALSO THREATENED Abreu AND COVERED MANY INCIDENTS ABUSES AND ASSAULTS THAT Abreu WAS 'SUFFERING IN THE HANDS OF PRISON OFFICIALS IN WARD C.F. SHU, AND THE MISCONDUCTS OF MEDICAL STAFF AGAINST Abreu, THE MISCONDUCTS AND VIOLATIONS, AND DELIBERATE INDIFFERENCE FROM THIS DEFENDANTS CONTINUED FROM JULY/2014 TO /THROUGH OF MARCH - APRIL /2015, PLACED Abreu HEALTH CARE SAFETY WELL BEING, WELFARE, IN AN IMMINENT DANGER.

22) The Defendant RIVERA / Haggerty, she HAS WRITTEN ALSO SEVERAL TICKET REPORTS IN THE YEAR 2012 IN THE SHU AT WARD AND WAS DOING THE SAME OR SIMILAR MIS-CONDUCTS AND VIOLATIONS OF Abreu RIGHT WHEN Abreu RETURNED TO WARD C.F. SHU IN JULY/2014.

23) THE DEFENDANTS HAMILTON, MAYER, SKUBIS & POWELL WERE SEXUALLY HARASSED WITH 'IMPROPER AND SEXUAL MISCONDUCTS AND BEHAVIORS IN DIFFERENT INCIDENTS HAPPENED BETWEEN THE SHU AND THE WARD AT WARD C.F. IN THE YEAR 2014 (JULY 2014) TO /THROUGH 'MARCH' /2015

- 24) The Defendants HAMILTON, SZABICK AND RASPOCK were BURNED Abreu with Hot water, Denied Abreu his meals AND Food's Damaged OR/AND DESTROYED Abreu Legal Papers, with water in Retaliation for Abreu file grievances AND 'COMPLAINTS' against them AND OTHER STAFF in WARD C.
- 25) Abreu wrote grievances AND complaints reporting that C.O. HAMILTON Have SEXUALLY HARASSED TO Abreu from January / 2015 to / Through March 2015 called TO Abreu his MOMMI, his BITCH, his LITTLE GIRL AND asked Abreu TO SUCK his penis. AFTER C.O. 1 STARTED TO TOUCHED Abreu BUTTOCK INTENTIONALLY DURING ECORTS / POT FRISK.
- 26) ON March / 04 / 2015 THE INSPECTOR general Investigator (OSI INV.) AND THE SGT MORA INTERVIEWED Abreu SEPARATELY in AN PRIVACY / INTERVIEW ROOM in / LOCATED AT THE SHU AT WARD C. About Defendants HAMILTON, AND Counselor MR 'SKUBIT' SEXUAL MISCONDUCTS AGAINST Abreu in THE SHU.
- 27) Abreu explained I.G./OSI INV. AND SGT MORA the Happened TO Him. AND The multiply HARASSMENTS MISCONDUCTS AND Abuses against Abreu, by THE DEFENDANTS.
- 28) However approximately between 20 TO 30 MINUTES AFTER the interview with OSI INV. AND SHU SGT MORA, THE C.O. HAMILTON WALKED FRONT Abreu cell gave TO Abreu A LOOK LIKE he want TO Kill Abreu. AND MAKE signs OF THREATS. AFTER C.O. HAMILTON WALKED BEHIND Abreu cell via THE CAT WALK BEHIND THE CELL WALL.

29) The Defendant Hamilton then called to Mr Abreu yelling screaming AND saying "I will go to kill you fucking Bitch" I will go to catch you fucking Homo, then Abreu listen AND heard alot of stronger voices behind his cell sink AND toilet the voices coming behind Abreu sink - toilet that ARE connected to in one piece attached to the cell wall from where C.O. Hamilton was the Area of the cat walk, then alot of cold waters were coming out from Abreu sink hole in a way that the water was touching his cell ceiling cell door bars, AND in alot of pressure, the water was hitting all my cell Areas from the ceiling to Abreu bed clothing, legal materials / papers legal books (Abreu has approx 22 books of legal materials inside of his cell in situ) AND the water was hitting Abreu too

30) When the water stopped Abreu heard to C.O. Hamilton said yes bitch taken it. After C.O. Hamilton walked front Abreu cell looked the cell all wet. AND He smiled too. He walked again back to the cat walk / AND put more waters in Abreu cell. Again all intentionally AND in bad faith.

31) ON March / 05 / 2015 Early in the morning approx between 6:30 AM to 7:30 AM while Abreu was sleeping OR resting on his bed alot of hot waters started to coming from his sink the water was extremely hot. The hot water hit Abreu body, burned him in different parts of his body.

32) The HOT WATER PROVOKED INJURIES AND PAINS ON ABREU SKIN AND BODY ABREU HEARD AGAIN THE VOICE OF C.O. HAMILTON YELLED OR SCREAMED SAYING YEAH BITCH ABREU TURNED HIS CELL LIGHT ON AND SAW ALL HIS BED BODY CELL PROPERTY LEGAL PAPERS / BOOKS COMPLETELY WET & HOT OR WATER ON THE FLOOR TOO ABREU WAS CRYING DUE TO HIS PAINS HIS SKIN AND FACE AREA WERE VERY RED.

33) THE C.O. HAMILTON THEN YELLED AND SAY YEAH BITCH CRY LIKE A LITTLE BITCH AND THE C.O. HAMILTON LEFT AFTER THE WATER STOPPED, LAUGHED TOO, ABOUT ALL THIS.

34) THE C.O. HAMILTON AND C.O. SZABLIK WERE DELIVERED / SERVED THE BREAKFAST IN THE SHU APPROX 15 TO 30 MINUTS AFTER THE ASSAULTS WITH THE HOT WATER WHEN THEY ARRIVED FRONT ABREU CELL (ABREU WAS LOCATED IN THE LAST CELL OF THE SHU GALLERY) HE ASKED TO THEM FOR MEDICAL ASSISTANCE AND EMERGENCY SICK CALL SERVICES BUT THEY WERE IGNORED ABREU REQUEST, SMILED AND LOOKED EACH OTHER, THEY GAVE ABREU ON STYRO-FOAM TRAY AND A CUP & ("A STYRO-FOAM CUP") WHEN ABREU OPENED THEY IT WAS FULL OF WET TOILET PAPERS. THEY LAUGHED A LOT. THEY DON'T GIVE ABREU NO FOODS IN ALL FOR TWO OR THREE CON-SECUTIVE DAYS. THEY MAKE INTENTIONALLY AND MALICIOUSLY AND WERE SAYING AND ORDERED TO THE MEDICAL NURSES AND MENTAL HEALTH STAFF DON'T REPORT THE INCIDENTS AND DON'T REPORT MY COMPLAINTS IN THE RECORDS. ALSO THIS DEFENDANTS WERE SENDING TO OTHER GUARDS ALSO TO HARASS ABREU.

35) The Defendant Rosblock, a Correctional Officer in Warden Ck SHU. He also Burned Abreu with Hot water on 3/05/2015 in the SHU in the afternoon after the dinner was served in the unit. The COs were only served Abreu wet toilet papers but not foods in all in such styro-foam trays and cups.

36) The C.O. Rosblock yelled Abreu from behind the walls of Abreu cell via the cat walk saying the C.O. Hamilton MR Skubis AND Sgt Hodges send you a message then alot of Hot water in form of stream started to coming out from Abreu sink hole in pressure and he keep it on for a long period of time while MR Abreu was yelling and screaming STOP STOP please you are burned me with the Hot water it is burned my body STOP STOP but the stream of Hot water continued and Abreu only heard and listen to C.O. Rosblock saying "SUCK MY DICK BITCH DIE, DIE, DIE Ha, Ha, Ha, Ha. Then Abreu yelled back to him saying "You will go to jail if I die and you will go to jail and lose your job" also BUT ONLY RESPONDED Abreu "I am ready to go to prison Ha, Ha, Ha, Ha."

37) The C.O. Rosblock He pass all the night back and forth due the same things over and over from 6:00 PM to 10:30 PM to 11:00 PM (the change of shift.) He also denied Abreu medical attention to Abreu serious injuries and pains. AND Abreu also filed for sick call

38) ON 3/06/2015 Abreu report his injuries to the nurse but C.O. Hamilton ORDERED to she DONT REPORT Abreu injuries

39) The nurse was the RN. Geary a female nurse that was conducted the sick call services in the SHU along with a new nurse (UNKNOWN NAME) AND THE C.O. HAMILTON was escorted both when Abreu report to RN MS Geary about his injuries AND PAINS, in the begin she alleged that she saw Abreu injuries but C.O. HAMILTON then ORDERED TO SHE DON'T REPORT Abreu injuries PAINS OR COMPLAINTS SO SHE DON'T PROVIDED Abreu nothing in all. SO BOTH DEFENDANTS ACTED OF A FORM DELIBERATE AND INDIFFERENT TO Abreu injuries AND PAINS. AND AN OPR CONSPIRACY AND COVER UP. PLACED SO Abreu SAFETY SECURITY HEALTH WELL BEING WELL BEING CORE AND WELFARE IN AN 'IMMINENT DANGER'.

40) The DEFENDANTS Hodges, Keenan, Brown, Crowley, STIRK, Killinger, Schumacher, Sowa, Fischer, E. Meyer, Lissou, Hogger, Rivera, Varguez, Lucas, Meora, Hill, Morris, Jentz, Roberts, Herdzik, McGuire, Hyland, Wilson, Reid, Skubis, Herbinson, S. Mayer, Freeman AND Mendez HAS FURTHER KNOWLEDGE OF THE MISCONDUCTS OF THE C.O.S. HAMILTON, MR Szablick, Rosalock, AND STAFF MISCONDUCTS AGAINST Abreu DON'T FEEDING FOODS Abreu VIOLATE his RELIGIOUS FOODS/MEALS BURNED Abreu WITH HOT WATERS FLOODED his cell WITH HOT AND COLD WATERS KEEPING THE HOT WATER IN A HIGH PRESSURE THE WHICH BURNED Abreu LIPS TONGUE AND FACE EVERY TIME Abreu TRYING TO DRINK WATER TURNED OFF his COLD WATER SO Abreu WAS ALSO UNABLE CON DRINK WATER THEY SAW WITH THEM OWN EYES THAT THE WATER WAS IN HIGH PRESSURE WAS EXTREMELY HOT BUT THE DEFENDANTS IGNORED Abreu CONDITIONS OF A FORM DELIBERATE & INDIFFERENT

41) THE DEFENDANTS HAS ALSO FURTHER KNOWLEDGES THAT THE WATERS WERE DESTROYED ABRON LEGAL MATERIALS AND THE DEFENDANT STARK ONLY TOLD ABRON TO KEEP STRONGER AND FILE LAWSUITS REPORTING HIS CONDITIONS OF CONFINEMENT AND STAFF MISCONDUCTS AGAINST ABRON. ODDER THAN "MAYBE THE COURT CAN HELP YOU" THAT IS WHAT SHE TOLD ABRON. ALSO THE DEFENDANTS HAS FURTHER KNOWLEDGES OF THE FAISES, FABBRIATEDS AND MANIPULATE TICKETS REPORTS THAT STAFF AND GUARDS WERE WRITING TO "ABRON AND ALSO FURTHER KNOWLEDGES THAT THE MEDICAL STAFF AND NURSES WERE DENIED ABRON HIS T-12 MEDS, LIPITOR, CLARITIN PAIN MEDICATIONS AND OTHER MEDICAL CARE ATTENTIONS & TREATMENTS TO ABRON MEDICAL NEEDS, BUT THE DEFENDANTS COVERED UP ALL THIS AND IGNORED ABRON HORRIBLE CONDITIONS OF CONFINEMENTS AND ACTED AS IF OF A FORM DELIBERATE AND INDIFFERENT TO HIS COMPLAINTS AND MULTIPLE GRIEVANCES EXPLAINED THE STAFF MISCONDUCTS AND ABUSERS THAT ABRON WAS SUFFERING IN THE HANDS OF CORRUPT AND UNPROFESSIONAL STAFF OFFICIALS & GUARDS FROM JULY 2014 TO MARCH 2015.

42) THE DEFENDANTS ABOVE THEY REGULARLY WALK IN THE SITE AND SEVERAL WORK IN THE SITE AND OTHERS MAKE DAILY ROUNDS IN THE SITE SUCH AS L.T.S AND CAPTAINS AND SGT'S / SUPERVISORS SO THAT IT IS IMPOSSIBLE THAT THEY DON'T SEE / OBSERVED THE INCIDENTS AND IMPOSSIBLE THAT THEY DON'T HAS KNOWLEDGES ABOUT THE INCIDENTS. ALSO SUPERINTENDENTS AND HIS TEAM EG "DIA, DSA, DSP" HIS ASSISTANTS MAKE ROUNDS ONE TIME IN THE WEEK OR MORE IN THE SITE AND MENTAL HEALTH STAFF MAKE ROUNDS DAILY SO, ABRON REPORT TO THEM ALL THIS MANY TIMES OVER, AND OVER.

43) The Defendants Brown, Lempke, Meyer, Lucas, Meara, Roberts and Growley they placed Abreu behind a Plexiglass / cell shields and forced to Abreu to use also a 'special suit' called EXPOSER CONTROL SUIT. THE CELL SHIELDS IT DON'T HAS ANY HOLES IN THE PLEXIGLASSES, PROVOKED LACK OF AIR, LACK OF VENTILATIONS, LACK OF OXYGEN AND LACK OF VENTILATIONS, ALSO FROM THE VENTS AND LACK OF HEATING FROM THE OUT SIDE HEATS. AND THE SPECIAL SUIT, IT WAS PROVOKED ABREU A LOT OF PROBLEMS, HARASSMENTS, SEXUAL HARASSMENTS, THREATS FROM GUARDS AND OTHER PRISONERS, DENIAL OF MEDICAL AND MENTAL SERVICES, DENIAL OF COUNSELING SERVICES, UNABLE CON TO GO OR RECEIVE RECREATIONS AND VISITS. IT ALSO ALWAYS WAS PLACED SO TIGHTED TO ABREU NECK AND THROATS PROVOKED CHOKING SENSATIONS, RASH IN HIS BODY, PAINS IN HIS NECK AND THROAT BECAUSE IT USED A LOCK BEHIND THE SUIT NECK AREA TYPE PADLOCK AND THE SUIT WAS TOO HEAVY FOR CON TO WALK AND TOO HOT THAT IT PROVOKED ALSO ASTHMA ATTACKS OR RESPIRATORY PROBLEMS.

44) However, even MR Abreu reporting to the Defendants AND medical staff his conditions AND problems with the plexiglass and special suit MR Abreu was forced ANY way to wear the suit AND be in a cell with lack of air ventilation AND oxygen AND heating in summers AND winter time. THEY / THE DEFENDANTS CONTINUED APPROVED IT EVERY EACH WEEKS AND EVERY 30 DAYS ALSO REGULARLY THEY REFUSED TO PROVIDE ABREU WITH NOTICES AND ORDERS OF THE SPECIAL SUIT AND CELL SHIELDS ORDER, VIOLATED SO, ALSO ABREU DUE PROCESS RIGHTS AND HIS U.S. CONSTITUTIONAL RIGHTS.

45) The DEFENDANTS Roman Roberts Mender Skubis STIRK J. Mayer Rivera Haggerty, Lison AND other staff at Wende CF were wrote multiple false tickets AND reports to Mr Abreu in RETALIATIONS FOR Abreu grievances AND multiple complaints against them. Then the DEFENDANTS HEIF E MAYER 'Henry Hill Furloni' were assigned TO CONDUCT the Hearings (SUPERINTENDENT'S HEARING) APPOINTED BY SUPERINTENDENT Lemake. However each of this DEFENDANTS were violated Abreu due process AND his constitutional rights TO call witnesses TO ASSISTANCES AND TO ASSISTANTS denied documentary evidences AND DIRECTIVE that Abreu was in need EXCLUDED TO Abreu FROM his Hearings, DON'T ALLOWED TO MR Abreu TO ATTEND TO his HEARING OR TO PARTICIPATE IN his Hearings. CONDUCTED the Hearings IN A FORM ARBITRARY CORRUPTIOUS BIAS DISCRIMINATORY RETALIATORY AND TRYING TO COVER UP the DEFENDANTS Roman Roberts Mender Skubis STIRK Rivera Lison AND 'Haggerty' AND other staff MISCONDUCTS VIOLATIONS AND ABUSES AGAINST Abreu. FROM the MONTH OF JULY / 2014 TO MARCH / 2015. VIOLATED 50 Abreu 1st 8th AND 14th Amend. Rights.

46) The DEFENDANTS (Rowley Hill Connolly Wilson AND Lemake were 'Regularly DENIED Abreu' access TO the law LIBRARY, AND access TO the COURTS they were DENIED Abreu legal COPIES, legal POSTAGES, SEVERAL law LIBRARY MATERIALS, WRITING PAPERS, MONITOR INKJERES AND CARBON PAPERS AND other legal SUPPLIES AND INTERFERING WITH open cases, proceedings AND actions IN the COURTS that Abreu has PENDING, AND TRYING TO IMPEDE that Abreu can TO CONTINUE with his legal activities AND legal claims IN the COURTS.

47) Abreu has be forced to Abandone several of his actions lawsuits cases And proceedings And others cases, Proceedings cases And lawsuits were DIMITED due to the DEFENDANTS MISCONDUCTS. They Have clearly violated Abreu 1st And 14th Amend Rights U.S. CONST.

48) The DEFENDANTS Blake, Lemke, AND Schumacher were also missing. Throw away 8/OR NOT PROCESSED OR/ AND Filed Abreu's facility claims about the damages, Destructures AND mishandled of Abreu legal materials BOOKS AND Magazines AND PAPERS FOR SEVERAL DEFENDANTS in Warden CF / SHER. they were also DENIED Abreu several of his claims including the MITTING OF Abreu several bags of PROPERTIES. The DEFENDANTS were Doing all this intentionally AND in bad faith in RETALIATIONS AND FOR TRY TO COVER UP STAFF MISCONDUCTS AND ABUSES AGAINST Abreu. VIOLATE SO Abreu CONSTITUTIONAL RIGHTS UNDER THE 1st 4th AND 14th Amend. Rights U.S. CONST.

49) The DEFENDANT BORDINORO & VAZQUEZ were assigned to assist Abreu in his tickets but they also intentionally, REUSED TO PROVIDE Abreu with a good assistance, DON'T PROVIDED Abreu with many of his requests AND in several occasions DON'T come back to provide Abreu his requests. documents, PAPERS & DIRECTIVES. The DEFENDANTS ALSO CONSPIRED AGAINST Abreu along with the DEFENDANTS Reinhardt, E. Meyer, Hill, Urban, HEART, AND HEIF. in Warden CF SHER in DENIED Abreu the proper assistance in his tier III ticket reports. The DEFENDANTS Has violated the 1st AND 14th Amend Rights U.S. CONST. AND VIOLATED ALSO his due process rights, state regulations, AND the correction laws.

50) The Defendant GRODEN was Denied Abreu general Library Materials AND Denied Abreu Spanish Materials AND The Defendant FURLONI was also Denied Abreu Spanish Materials AND Bilingual Dictionaries Spanish - English - English - Spanish AND Denied Abreu Proper Cell Studies Materials AND Educations all in Retaliation AND 'DISCRIMINATIONS FOR Abreu grievance AND letters of COM - PLAINS Against They. violated so, Abreu U.S. Const. Rights UNDER 1st AND 14th Amend. Rights AND violate state LAWS AND Federal Laws AND State AND Federal Regulations.

51) The Defendant FERRON She was Regularly DONT Processed Abreu grievance and Abreu appeals to Superintendent AND CORC She also was refused to make rounds 'in the SHU Denied Abreu direct access to the Inmate grievance Program She in conspiracy with the Defendants was trying to cover up staff, guards AND officials abuses AND MISCONDUCTS AND VIOLATIONS THAT Abreu was suffering in the hands of corrupt AND UNPROFESSIONAL Defendants in the SHU in WADE CE. also all and each grievance COMPLAINTS sending to the Inmate grievance Program ARE Readings AND Reviewed by IGP SUPERVISOR ms FERRON so she learned alot of the Defendants' MISCONDUCTS so she is part of this violations of Abreu Rights when she get the knowledge of this violations through the grievance and appeals so her cover up placed Abreu like safety Security Health wellbeing welfare AND care in an imminent danger. She AND the Defendants BELLAMY, HALL, LEMKE, ANNUCCI & GROWLEY has violated Abreu 1st & 14th Const Rights, Regulations, Laws + DISC

52) The Defendant Johnson was assigned to delivery legal mail (incoming legal correspondences) AND legal materials from the law library. She regularly was missing Abreu incoming legal mails or not delivered. Abreu his legal mails AND law library materials that Abreu required in the law library forms, also Abreu filed multiply letters or complaints AND grievances reported to the Defendants Lemke, Brown, Growley, Jowa, E. Meyer, Connolly, Freeman, Robert, Hodges, Mooka, Skubis, Schumacher, Lucas, Keenan, Morris, Herdzik, McGuire, AND Hill, the misconducts AND violations of the C.O. Johnson against Abreu AND his legal mails & L.L. Request (legal materials from law library) the which Abreu believe were made in retaliation AND discriminations for Abreu complaints AND grievances against she AND other staff AND for the sign / plaque that Abreu has front his cell with the word EXPOSER AND because Abreu was wearing the special suit. So the Defendants acted of a form deliberate & indifferent to Abreu complaints AND rights AND violated Abreu 1st AND 14th Amend. Rights, state & federal laws & regulations.

53) The Defendant Krygier, along with the Defendant Skubis were denied Abreu his FOIC Request for Review Hearing packets, video tapes, video of incidents, hearing tapes, documents, directives AND other papers, all in retaliation AND in discrimination for priors grievances AND complaints that Abreu filed against they AND other staff. This Defendants has violated Abreu 1st AND 14th Amend Rights, AND state regulations, directives AND laws

54) The Defendants Hill AND CROWLEY ARE RESPONSIBLES OR ENFORCE THE FEDERAL LAWS UNDER PREA LAW TO REPORT TO LAW ENFORCEMENTS ANY INCIDENTS OF SEXUAL ASSAULTS SEXUAL HARASSMENT AND ROPES SUFFERING BY PRISONERS IN WIND CF/SHU IN THE HANDS OF PRISON STAFF, OFFICIALS AND GUARDS OR OTHER PRISONERS AND THEY HAS THE OBLIGATIONS OF TO PROTECT TO PRISONERS OF ANY KINDS OF RETALIATIONS AND TO CONDUCT INVESTIGATIONS, TO REMOVE THE STAFF EMPLOYEES OR OFFICIALS / GUARDS WHO ARE 'SEXUALLY' ASSAULTED HARASSED THREATEN RETALIATED OR ROPED TO AN INMATE WHO HAS REPORTED SUCH CLASSES OF ASSAULTS/HARASS. AGAINST THE STAFF GUARDS OR OFFICIALS. HOWEVER IN ABREU CASE 'THEY INTENTIONALLY AND IN BAD FAITH IGNORED ABREU COMPLAINTS AND REPORTS OF SEXUAL ASSAULTS, SEXUAL HARASSMENT AND RETALIATIONS FROM THE DEFENDANTS SKUBIS & HAMILTON WHO WERE REGULARLY SEXUALLY HARASSED AND ASSAULTED AND/OR RETALIATED AGAINST ABREU IN SULLIVAN CF SHU ALONG WITH THE DEFENDANT MAYER, WHO ALSO WAS SEXUALLY HARASSED ABREU FROM JULY/2014 TO MARCH/2015 VIOLATED CLEARLY ABREU 1ST 8TH AND 14TH AMEND RIGHTS, AND VIOLATED THE PREA LAW CIVIL RIGHT LAW AND PLACED ABREU IN AN IMMINENT DANGER.

55) The Defendants MARY GEORRY LISA LA PENNA TOMORA DAVIS MARYLISA HAYDON AND OTHER MEDICAL NURSES IN WIND CF/SHU WERE REGULARLY DENIED ABREU HIS MEDS. /PRESCRIBED MEDICATIONS FOR T.B PAINS MEDS, LIPITOR ALLERGY NASAL SPRAY DENIED SICK CALL SERVICE AND REFUSED TO 'OBBREU' AND/OR REPORT ABREU MEDICAL COMPLAINTS FROM JULY 2014 TO THE MONTH OF MARCH / 2015.

56) Abreu was placed also a several inadequate AND UNLAWFUL RESTRICTED DIET IN WARD C.F. SITU FOR THE DEFENDANTS. THE RESTRICTED DIET NOT ONLY WAS IT inadequate BUT ALSO WAS THE DIET LACKED OF NUTRITIONS, AND THE DEFENDANTS WHO SENTENCED TO PLAINTIFF ABREU TO RESTRICTED DIETS IN THE DISCIPLINARY HEARINGS AND THE DEFENDANTS WHO OFFERED SUCH SENTENCES HAS FURTHER KNOWLEDGES THAT THE DIET WAS inadequate LACK OF NUTRITIONS AND ABREU NOT WAS SUPPOSED TO BE SENTENCED TO THE RESTRICTED DIET BECAUSE HE WAS DESIGNED LEVEL I MENTAL HEALTH BY THE OFFICE OF MENTAL HEALTH. WHEN AN INMATE IS SENTENCED TO RESTRICTED DIET ALSO THE MEDICAL STAFF AND NURSES ARE SUPPOSED AND MANDATED TO EXAMINE THE INMATE AND TAKE BLOOD PRESSURE AND WEIGHT IN LEAST TWICE IN THE WEEK PLUS TO CHECK IN THE INMATE DAILY. BUT IN ABREU CASE THE DEFENDANTS NURSES REFUSED TO DO SO, PLACED ABREU HEALTH, CARE, SAFETY, WELL BEING, SECURITY AND WELFARE IN AN IMMINENT DANGER, AND THEY WERE DELIBERATE AND INDIFFERENT WHEN ABREU REPORTED HIS SYMPTOMS AND FILED SICKCALL REPORTED ALL THIS.

57) THE DEFENDANTS ANNUNCI; KORNIGSMANN; MCKOY; BRILANT; VENTROZZI; PRACK; HOLLMAN; GROSS; BOSCO; MENNING; CHIEF INSPECTOR GENERAL (CHIEF OSI); RAMIREZ - ROMERO; BOB HEYWOOD; ASH; N.Y.S. DOCS; N.Y.S. OMH, AND STATE OF NEW YORK AND MR. HALE AND MR. BRINIER HAS FURTHER KNOWLEDGES OF ALL AND EACH OF THE THINGS THAT WERE HAPPENED TO ABREU IN WARD C.F. SITU IN THE HANDS OF WARD C.F. DEFENDANTS BUT EVEN ABREU ~~RIGHTLY~~ REPORTED TO THEM IN LETTERS (MILITARY LETTER OF COMPLAINTS ALL THE INCIDENTS, INCLUDING IN GRIEVANCES THEY IN RETALIATIONS, & INTENTIONALLY SUPPORTED EACH OF THE VIOLATIONS.

58) The Defendants HAMILTON SZABICK MAYER WILSON CONNOLLY CROWLEY FREEMAN Hill Grode REID STIRK TOPOREK WYZYKOWSKI Hodger Killinger KRYGIER SKUBIS SCHUMACHER MORA SOWA HERBISON LEVITT MAGYAR REINHARDT ROBERTS GREGOIRE BLAKE - LUCAS FURLANI GEARY FINK FUCINA PERRON HEIK LISSON LA PENNA MEYER DAVIS Labadz VOGUEZ HAYDEN KEENAN LEMKE BROWN MENDEL ROSPOCK FISCHER AMBROSOLI BOZER KUA BUKOWSKI GINK FUCINA FURLONI GODFREY GORNY GRODEN HARRY LEUTHER ZISSON PARKER RIVERA HOGGERTY ROBINSON BORDINARO STIRK STUBBUSZ TOPOREK WAHA MCGUIRE HERZIK JOHNSON JENTZ MORRIS URBAN EVANS HYLOND VOLLMER AND SIMMONS - (The Defendants in Wende C.F. / SHU) They continue their MISCONDUCTS against ABREU UNTIL ABREU WAS TRANSFERRED TO SULLIVAN CF SHU IN AN EMERGENCY TRANSFER, IN MARCH 2015 AFTER THE FEDERAL JUDGE HON. SIROGWA FROM THE WESTERN DISTRICT COURT OF NEW YORK U.S.D.C. WROTE A LETTER OF COMPLAINTS REPORTED DEFENDANTS MISCONDUCTS AGAINST ABREU AND HIS HARSH CONDITIONS OF CONFINEMENTS IN MARCH /17/2015 TO DEBRA MARTIN, AT THE ATTORNEY GENERAL OFFICE IN ROCHESTER WITH COPY OF ABREU 3/08/15 LETTER AND COPY TO CATHERINE LEAHY SCOTT N.Y.'S OFFICE OF THE INSPECTOR GENERAL ALSO WERE PROVIDED WITH A COPY OF THE LETTER.

59) ON OR ABOUT APRIL 01, 2015 ABREU ORRIVED TO SULLIVAN CF SHU WITH APPROX. 22 bags of legal materials, a HAND GRACE, AN ASTHMA INHALER WITH PRESCRIBED MEDICATIONS AND WITH A PRESCRIBED PHYSICAL THERAPY OR RECOMMENDATIONS FOR PHYSICAL THERAPY.

60) UPON ABRON TRANSFER TO SULLIVAN CF, SHH THE DEFENDANTS BURNETT AND KEYSER WITH THE SUPPORT OF THE DEFENDANTS HAYWOOD AND BRUGH CONFISCATED ABRON LEGAL MATERIALS AND ONLY ALLOWED AND LET ABRON RECEIVE FIVE (5) BOGS OF LEGAL MATERIALS THE DOUG COMMISSIONER ANNUNCI AND BELMIRER ALSO AUTHORIZED THIS VIOLATIONS. THEY HAS FURTHER KNOWLEDGES THAT THE WESTERN DISTRICT COURT HAS APPOINTED ABRON PRO BONO COUNSELS AND THAT ABRON WAS IN NEED OF ALL HIS LEGAL MATERIALS FOR CON TO ASSIST TO HIS COUNSELS TO RESPOND TO THE MOTION FOR SUMMARY JUDGMENT, SO, THERE WERE A CLEAR CONSPIRANCY BETWEEN THE DEFENDANTS IN WENDE CF WITH THE DEFENDANTS IN SULLIVAN CF AND THE DEFENDANTS IN DOUG ALBANY N.Y. CENTRAL OFFICE AND THE OFFICE OF THE INSPECTOR GENERAL ASSISTANTS FOR TO IMPEDER AND INTERFERE WITH ABRON CASES, SUITS PROCEEDINGS APPEALS AND PENDING SUITS (ACTIONS) IN THE WESTERN DISTRICT COURTS, SO, ALL WAS PLANNED AND ALSO CALCULATED FOR THIS DEFENDANTS.

61) ABRON MEDICAL PRESCRIPTIONS ALSO WERE CONFISCATEDS AND DISCONTINUED OF A FORM DELIBERATE AND INDIFFERENT BY THE DEFENDANTS SIDOROWITZ, DIAZ, ARNOLD & EGGERS IN CONSPIRANCY WITH THE MEDICAL DEFENDANTS IN WENDE CF AND THE DEFENDANTS KOENIGSMANN REDDING AND THE DEFENDANTS ANNUNCI, BELMIRER, HAYWOOD AND BRUGH WHO ALSO APPROVED AND AUTHORIZED THE DISCONTINUATIONS OF ABRON, T.B. MEDICATIONS; ASTHMA INHALER HONTS BRACE, THE ORTHOPEDIC BOOTS ABRON PRESCRIBED EYE GLASSES, PAIN MEDICATIONS, LIPITOR, CLORITIN, LOTIONS FOR DRY SKIN AND NASAL SPRAYS & THE RECOMMENDATIONS OR PRESCRIPTIONS FOR PHYSICAL THERAPY. SO, THE CONSPIRANCY IS VERY CLEAR BETWEEN THIS DEFENDANTS.

62) Abreu was also placed in the Special Suit AND Sign / Plaque Exposer in Sullivan CF AND placed behind a special Plexi-glasser that don't allow OR let to staff to observe hair or Abreu bottom body all this was ordered AND approved by the Defendants BURNETT, KEYSER, ANNUCCI, BOLLINGER, HEYWOOD, BRUN, VENETTOZZI AND HILTON who ALSO authorized the special suit sign exposer AND others deprivations. They have also further knowledges that the control suit AND sign exposer are unconstitutional violated the 1st 8th AND 14th Amend. Rights violate clearly does SHU Directive # 4933 AND state Regulations violate the equal protection the due process AND the double jeopardy / ex post facto this provoke threats, denials, denial of medical care, discriminations, abuses, retaliations AND sexual harassments so the Defendants they continue the same misconducts that they has against Abreu in Wende CF they continued this in Sullivan CF SHU intentionally in bad faith AND in retaliations placed so Abreu safety wellbeing health, care welfare AND security in an 'Imminent Danger'.

63) While Abreu was in Sullivan CF SHU FROM APRIL 2015 TO OCTOBER 15, 2015. Abreu suffered several physical AND sexual assaults alot of sexual harassments threats denial of sick call services regularly by medical nurses denial of his medical AND mental health / psychiatric meds. multiply falses of manipulated AND fabricated tickets reports verbal harassment. discriminations denial of mental health services multiply cell searches AND others violations. so this is very clear that the special suit & sign place AND put Abreu in imminent danger

64) The Contract suit was also provoked pains discomforts and other many problems include choking sensations, be placed to tighted to Abreu neck and throat problems for to work and too hot provoked respiratory problems and/or asthma attacks or symptoms of asthma. The special suit and regular plexiglasses were discontinued or stopped in Sullivan CF, situ of to be used against Abreu, but this was due after Abreu multiple complaints ripped the suits and approx one or two months before his transfer to Great Meadow CP.

65) The Defendants in Sullivan CF and Dover Contract Office officials Defendants were doing some or similar misconducts and violations such as they were doing in Wende CF. Denied legal copies. They also waited Abreu in legal postages and legal copies, denied proper and adequate medical and mental health care treatment and attentions. Also ignored Abreu complaints and grievances intentionally and in bad faith in a type of retaliations and discrimination. They also were denied Abreu FOIL requests. Denied writing papers and envelopes. The outgoing mails (legal mails and regular correspondence) were missing. Thrown away and/or holding Abreu mails. Courts, judges, legal clerks, legal organizations and attorneys not were received Abreu mails and correspondence. Also Abreu several actions lawsuits and proceedings and appeals such as Article 78 Court of claims state/federal Habeas corpus 28 USC § 1983 complaints and appeals were dismissed due to the Defendants misconducts against Abreu.

66) The Defendants MISCONDUCTS against Abreu about his legal postages, legal copies access to the courts, access to the legal materials AND legal supplies get worse for the months of August, September AND October 2015, when Abreu PRO bone counsel were working with Abreu for CON to do his REPLY / OPPOSITIONS TO DEFENDANTS SUMMORY JUDG-
 -MENTS Filed in the Western District Court of New York in the actions / cases Abreu v. Farley, consolidated with Countryman case. This orders of interference AND / OR IMPROD this Postages legal copies, legal supplies AND access to the courts was / were APPROVED AND / OR ORDERED ALSO for the Defendants Hetwood, Bruen Annucci, Dinnick Koyser AND the New York State Attorney General Office ASSISTANTS FROM the Rochester Area. All was a Plan CONSPIRACY AND ON TEST FOR TO STOP Abreu in his legal activities AND TRY SO, ALSO OF DISMISS Pending lawsuits, appeals, claims, proceedings AND actions, AND Denial TO Abreu access to the courts AND his ATTORNEYS AND legal organizations. VIOLATED SO Abreu 1st 4th 8th AND 14th Amend Rights, Docs Directives, Federal AND state Regulations AND laws.

67) The Defendants Carrick N. Jackson, Gail Williams, Sullivan, Menning, Bosco, McCullach, Bernstein, Koenigsmann, Bellamy, Venetozzi, Bellnier, Hise, Hetwood, Bruen, Annucci, State of New York, OMH, Docs, Hilton, McKay, Hoffman, Effman, Yaiser, Chiefost, Sidorowicz, Diaz, Egger, Arliss, Burnett AND Koyser, Failed AND Refused TO Protect Abreu Rights, Security, Safety, Health, Well being, Welfare care & Life of Properties. When Abreu suffered all the violations such as explained above, happened between Wanda & Sullivan & Siter.

68) The Defendants Has And Had Further Knowledge That Abreu US Constitutional Rights Civil Rights Human Rights State & Federal Laws And Regulations Directives And Policies Of The DOJ And DMH And CNYAC were Violated multiply times when Abreu was subjected to Abuses Assaults Sexual Assaults Sexual Harassment Denial Of his medications Medical And Psychiatric Denial Of Sick Call Services Denial Of Adequate And / Or Proper Medical And Mental Health Services Medical And Mental Health Staff And Nurses Misconducts, Discriminations Retaliations Violations Of his Religious Kabbalah Meals And Violations Of his Religion And his belief Denial Or Impeded Or Interferenced With Access To The Courts Attorneys legal Or - gations Low Library General Library - Educations Programs Assistants Force And Fabricated And Exaggerated Multiply Tickets / Reports in Retaliations / Discriminations Violations Of the Due Process During the Hearing Proceedings, The Control JUDGE Suits Plagued / Sign Exposed The Problems With The Suits The Problems With the Plexiglasses / Cell Shields - The multiply conspiracy And campaigns Of Calculated Harassments And Cell Shields Cell Searches Destroy Of Properties Missing Mails Threats That Abreu suffered between Wade & Sullivan Of

69) The Defendants Learned Of All And Lack Of This Serious Violations Through VIO & Across Letter Of Multiply grievances Complaints Appeals in Rounds in the Suits Verbally Via Other inmates Investigators Reports Records And Several Of They observed The violations Abuses, mistreatments Harsh conditions Of Confinement But they ignored all this Of a form deliberate And Indifferent.

70) The Defendants in Sullivan C.F., AND THE DEFENDANTS IN DOCS CENTRAL OFFICE, CNYPC UNIT, STATE OF NEW YORK DOCS AND THE OFFICIALS STAFF EMPLOYEES NURSES AND PERSONNEL, CONTINUED WITH THEIR ABUSES MISCONDUCTS RETALIATIONS VIOLATIONS HARASSMENT DISCRIMINATIONS AND HUMILIATIONS UNTIL AND STILL ABRON WAS TRANSFERRED TO GREAT MEADOW CF STH, IN AN EMERGENCY TRANSFER AFTER HIS LAST ASSAULTS IN SULLIVAN CF IN THE HANDS OF STAFF/GUARDS (HE SUFFERED ASSAULTS PHYSICALS IN THE HANDS OF GUARDS IN THE MONTHS OF SEPTEMBER 2015 TO OCTOBER 2015).

71) ON OCTOBER 15 2015 ABRON WAS TRANSFERRED TO GREAT MEADOW CF STH IN TWO MINI-VANS, ONE WHERE HE WAS TRANSPORTED UNDER VIDEO-CAMERAS HANDS ALONG WITH A SGT SUPERVISOR AND TWO CO'S/GUARDS AND ANOTHER FOR CON TO TRANSPORT HIS 27 BAGS OF LEGAL MATERIALS.

72) UPON ARRIVE IN GREAT MEADOW CF STH, ABRON PAIN MEDICATIONS NEURONTIN PRESCRIBED TO ABRON DUE TO HIS CHRONIC PAINS IN HIS LOWER BACK RIGHT HAND LEFT ANKLE/FOOT AND ARM, WERE STOPPED AND DISCONTINUED ALONG WITH THE MEDICINES FOR HIS HIGH CHOLESTEROL, SUCH AS LIPITOR & CLORITIN FOR WEATHER ALLERGY WERE ALSO DISCONTINUED TOTALLY BY DR. POOLANO AND DR. KORONDI. ABRON T.B. MEDICATIONS NAUSEA SPRAY HAND BRACE ORTHOPEDIC BOOTS BACK BRACE LOTIONS PRESCRIBED EYE GLASSES WERE ALSO DENIED ABRON WITHOUT ANY REASONS OR EXPLANATIONS OR NOTIFICATIONS IN ALL. ALSO ALL TREATMENTS FOR HEMORRHOIDS BLEEDING & PAINS WERE DENIED ABRON BY THE DEFENDANTS SO THE CONSPIRACY RETALIATIONS & CONTINUE HARASSMENTS FOLLOWED ABRON ALSO TO GREAT MEADOW CF STH.

73) Abreu was placed in the SHU R1-27 cell. The cell door and bar has already a cell shield / plexiglass writing for Abreu. Abreu asked to the supervisors and cos why a cell shields were placed front his cell bars/door. They only responded and told Abreu, "you know what you did in waste of SHU and Sullivan of SHU we see all your records and they call us and advised us who you are and told Albany officials 'let know also' who you are. Remember you are a CMC designation so Inspector general office also advised us who you are before they approve the transfer and sent to you here."

74) Abreu explained to them that any alleged incidents happened in waste of SHU of Sullivan of SHU don't have nothing to do with great reason of because he don't have doing nothing wrong to no one here but they only responded to Abreu we know who you are remember you was here in the past you have a lot of problems with staff here. They remember you perfectly and you sued to they also in the past in the courts so believe me they don't have forgotten you." This was the explained Abreu by supervisors.

75) Abreu was placed in a dirty cell contaminated with insects over all the floor sugar over all the floor ants over all the floor. The toilet it was very dirty and the sink was also very dirty. The sheets provided Abreu were also dirty. The liner / pillow case was dirty. The colors of it sheets and pillow case were brown color, smell very bad, & pillow broken.

76) Abreu was denied of all cleaning supplies. The JMW SUPERVISORS SGT. BOSCH, AND SGT LOWRY ADVISED Abreu THAT WHILE HE CONTINUE BEHIND CELL SHIELDS HE CANNOT TO CLEAN HIS CELLS ("NO CLEANING SUPPLIES") AND NO HOT WATER AND NO CELL BUCKET SO THEY ALSO PUT AND PLACED Abreu IN RESTRICTIONS OF ALL THIS ARTICLES AND ITEMS WITHOUT Abreu DONT DO NOTHING WRONG IN GREAT MEADOW.

77) Abreu was also advised that All his legal materials were confiscated AND that FROM THE 27 bags OF his ACTIVE legal materials HE ONLY WILL RECEIVE ONE bag. THAT IT Abreu EXPLAINED THAT UNDER DOJ DIRECTIVES REGULATIONS AND THE LAWS AND FEDERAL CONSTITUTION. Abreu WROTE ALSO LETTERS OF COMPLAINTS TO THE DEPENDENTS MILLER EASTMAN DOJ COMMISSIONER ANNUCCI. DSP MELOU. DSA. BROWN. KOENIGSHOWN. THOMAS. KARONDI. "HOLLMAN". HERWOOD. BELMIR. MR. VONETTO. CHIEF OF OSI. MCKOY. HALL, & HIRTON EXPLAINED THE PROBLEM WITH his MEDICAL PRESCRIPTION PAINS, STAFF MISCONDUCTS THREATS OF PHYSICAL ASSAULTS BY GUARDS AND SUPERVISORS, SGTs. THE PROBLEM WITH THE CELL SHIELDS CLEANING SUPPLIES AND Abreu legal PROPERTIES/MATERIALS WHERE Abreu EXPLAINED THAT ALL his legal papers ARE ACTIVE CASES, HE HAS A LOT OF legal DOCKETS COURT ORDERS TO FOLLOW BUT THE DEPENDENTS ABOVE REFUSED TO ACT TO Abreu. ACTED OF A FORM DELIBERATE AND INDIFFERENT TO Abreu SERIOUS CONDITIONS OF CONFINEMENTS AND THE MISCONDUCTS OF STAFF. Abreu ALSO ADVISED TO THE DEPENDENTS THAT HE IS NOT SUPPOSED TO BE IN GREAT MEADOW OF JMW AND THAT STAFF HAS STARTED TO THREAT Abreu WITH PHYSICAL ASSAULTS, AND IT HAPPENED TO HIM TOO.

78) ON OCTOBER/16/2015 THE DEFENDANT MR IVER SPOKE WITH ABREU IN THE WITH OBS ROOM. MR IVER TOLD TO MR ABREU THAT NO ONE WHAT HIM IN GREAT MEADOW CF AND MR IVER ALSO ADVISED MR ABREU, THAT HE HATE MR ABREU BECAUSE MR ABREU SOLD HIM IN THE PAST AND HE ALSO DONT WANT ABREU TO GO IN GREAT MEADOW CF MR IVER SAY ALSO TO ABREU THAT HE IS THE OHH CLINIC ON ASSIGNED IN THE SHU. AND THAT HE MAKE ROUNDS DAILY OF MONDAY TO FRIDAY. BUT THAT ABREU DONT EXPECT ANY HELP, ASSISTANCE OR MENTAL HEALTH CARE FROM HIM OR OHH STAFF IN THIS FACILITY BECAUSE ABREU HE NEED TO PAY WHAT ALLEGED ABREU DID TO HIM IN THE PAST. MR ABREU, ALSO REPORT TO MR IVER HIS CELL CONDITIONS, LACK OF VENTILATIONS, LACK OF CELL CLEANING, SUPPLIES, PLEXIGLASS, CELL DIRTIER SHEETS AND DEPRIVATIONS OF HOT WATER, LEGAL PAPERS AND MEDICAL STAFF MISCONDUCTS, BUT MR IVER RESPOND WERE I DONT CARE IF YOU DIE RIGHT NOW. I DONT CARE WHAT HAPPEN YOU IN THIS FACILITY NO ONE REALLY CARE ABOUT YOU. YOU HAVE ALOT OF ENEMIES HERE AND IN ALBANY (DOCS AND OHH). WHAT DO YOU EXPECT WILL HAPPEN YOU HERE? NO BODY LIKE YOU, YOU KNOW THAT, MR IVER THEN SEND ABREU BACK TO HIS CELL IN THE SHU.

79) THE DEFENDANTS MILLER AND MELECO, WROTE A LETTER TO MR ABREU ALLEGED THAT THEY COMMUNICATED WITH DOCS ALBANY AUTHORITIES, AND EXPLAINED THE PROBLEMS BUT THAT THEY ALLEGED THAT ABREU IS IN THE RIGHT PLACE AND RIGHT PRISON. ABREU WAS ALSO ADVISED THAT THE COUNSEL'S OFFICE (DEFENDANTS HEYWOOD AND MR BROWN APPROVED AND AUTHORIZED BY DEFENDANTS ANNUNCIJ BRUNIER) THAT DOCS HAS HATED HIM IN LEGAL POSTAGES AND LEGAL COPIES. SO, NO MORE ADVANCE REQUEST TOO.

80) The defendants halted Abreu in legal Postages And legal Copies is a clear Proofs And evidences of Docs OFFICIALS/ Defendants INTERFERING AND IMPEDED ABEU intentionallY AND IN bad FAITH ACCESS TO THE COURTS AND ACCESS TO HIS ATTORNEYS/ COUNSELS 'APPOINTED BY THE COURTS AND AN OPEN CONSPIRACY along with THE ATTORNEY General assistance INTERFERENCED & TRYING TO IMPEDe THAT 'ABREU WORK WITH HIS COUNSELS FOR TO RESPOND TO DEFENDANTS SUMMARY JUDG (Judgment) IN THE ACTIONS /CASES ABEU ✓ FORLEY CONSOLIDATED WITH COUNTRYMAN CASE AND FOR IMPEDe AND INTERFER with ABEU OPEN CASES

81) **They** also placed Him Limited legal supplies LIMITED WRITING PAPERS LIMITED CARBON PAPERS LIMITED ENVELOPES AND 'LIMITED ACCESS TO LAW' LIBRARY MATERIALS NO legal books in all. AND NO legal assistance FROM THE L.L. CLERK LOWS. The Defendant P. Sullivan also started DENIED ABEU advance Request FORMS CARBON PAPERS AND additional legal supplies AND OTHERS legal materials THAT ABEU WAS IN NEED FOR TO DO HIS legal WORKS. Even ABEU SHOWED TO THE DEFENDANTS SULLIVAN, MELECIO MILLER, AND ANY OTHER LAW LIBRARY 'OFFICER' SUCH AS LL SUPERVISOR DEVITO. ANY COURT ORDERS OR COURT DEADLINES 'OR ANY STATUTES OF LIMITATIONS FOR ABEU FILE A COURT OF CLAIMS, OR ARTICLE 78. PETITIONS THEY DENIED' ABEU THE legal supplies AND legal Copies AND legal supplies also DUE TO THE DEFENDANTS ANNICCI, DRUEN, HEYWOOD, MELECIO MILLER, AND BELLWIER AND EASTMAN. Several ABEU Pendent cases, Proceedings, Actions AND APPEALS were DISMISSED IN THE COURTS BECAUSE ABEU WAS UNABLE COU TO LITIGATE SUCH CASES IN THE COURTS TOO

82) Abreu was filed sick call daily reported chronic back pains, right hand pains, right hand carpal tunnel problems, right arm carpal tunnel problems, left ankle, foot problems and pains, asthma problems, and Mr Abreu was also asked for his pain medications Neurontin a back brace, hand brace, his orthopedic boots, physical therapy, the need of a surgery in his right arm, reported pain and bleeding in his anus, rectal area the need of his Lipitor and Claritin meds. And the need of his photo ray, lens/eye glasses but the medical nurses/Defendants in Great Meadow CF such as Lipka, Havens, Rogue, LaFreck, Brunelle, Von, Order, Watkins, and Boices were regularly denied Abreu Sick-call services. Refused to address Abreu medical complaints of pains, bleeding and the need of his medical devices. And after Abreu has review his medical records those nurses don't were reported many things in Abreu Records.

83) Because Abreu was filed sick call slip/request daily, the SHU guards, COs and the supervisors started to harass and threats to Abreu with physical assaults, and they and the nurses to told and threatened Abreu of stop of filed sick call slip or he never will see a doctor, at Great Meadow CF. Abreu then he started to report the COs/supv. and nurses (Defendants) misconducts, harass, retaliations, threats and discriminations. Filed also grievance complaints and letters of complaints to the facility Health Service Director Korondy, to the nurse administration (administrator) Mr Morris, to the Deputy Superintendent for Administration, to Superintendent Miller and other docs authorities.

84) Abreu also wrote multiple letter of complaints and sent it to the Defendants KORNIGSMOHN, ANNUCCI, BEILNIER AND YAJIER. REPORTED THE NURSES AND GUARDS / SUPERVISORS MISCONDUCTS. ALSO ABREU WROTE TO THE CHIEF OF OSI / INSPECTOR GENERAL OFFICER. BUT THE DEFENDANTS FAILED REFUSED AND IGNORED IN PART ABREU COMPLAINTS OR DON'T RESOLVE THE PROBLEMS THEY AVOID 'OF A FORM DELIBERATE INDIFFERENCE TO MEDICAL NEEDS.

85) Abreu receive a HAND SURGERY IN THE YEAR 2014 IN MARCH AND A HAND SURGERY FOR CARPAL TUNNEL IN JULY / 2015 AND A COLONOSCOPY ALSO IN THE YEAR 2015. WHEN ABREU ARRIVE TO GREAT MEADOW CF. HIS RIGHT HAND SURGERY WAS FRESH, HIS HAND WAS / IS IN EXTREME OR CHRONIC PAINS. IN GREEN HAVEN CF. SIX DOCTORS SPECIALIST AND EXPERT THEY TO PRESCRIBED ABREU MULTIPLE PAIN MEDS, A BACK BRACE A HAND BRACE. ORTHOPEDIC MEDICAL BOOTS LOTIONS LIPITOR CLARITIN & NOSE SPRAYS AND RECOMMENDATIONS FOR PHYSICAL THERAPY BECAUSE THEY FOUND PROBLEMS AND ALSO BELIEVED ABREU COMPLAINS OF PAINS AND OTHER PROBLEMS OF HEALTH INCLUDING HIGH CHOLESTEROL HEMORRHOIDAL BLEEDING PROBLEMS PROBLEMS IN HIS STOOL. ABREU GET TUBERCULOSIS IN THE SIX BECAUSE DEFENDANTS KEEP HIM BEHIND PLEXIGLASS FOR A LONG PERIOD OF TIME SO THE VENTILATION AND AIR DON'T CIRCULATED WELL INSIDE OF THE CELLS. ABREU HAVE BEEN IN THE SIX LIKE 10 (TEN YEAR CONSECUTIVE) AND HAS BEEN ASSAULTED ALSO SEVERAL TIME BY CORRUPT COS. SO HIS CLAIMS OF PAINS AND OTHER MEDICAL COMPLAINS HAS MERITS SO HIS ONLY COMPLAINS HAS ALSO MERITS AND A REASON. THE REASONS ARE THAT HE IS IN NEED OF HIS MEDICATIONS, AND MEDICAL DEVICES IN THE SIXES.

86) HOWEVER THE DEFENDANTS IN DOCS ALBANY IN WENDE CF IN SULLIVAN CF AND IN GREAT MEADOW CF APPEAR DON'T UNDERSTAND ALL THIS, OR DON'T WANT TO UNDERSTAND NONE OF THIS, BECAUSE THEY ARE DOING ALL THIS IN CONSPIRACY AND IN RETALIATIONS AND IN DISCRIMINATIONS AND ALSO INTENTIONALLY FOR TO FRUSTRATE, IMPEDE AND INTERFERE WITH ABREN PARENTS ACTIONS AND LAWSUITS AGAINST THEM IN THE WESTERN DISTRICT COURT. AND TO THE SOME TIME TO ASSIST TO THE N.Y. ATTORNEY GENERAL OFFICE AND COUNSEL'S OFFICE.

87) THE SOME NURSES THE SOME DOCTORS (DEFENDANTS) IN WENDE SULLIVAN AND GREAT MEADOW CF ALLEGED ABREN THAT ALL THIS CAME FROM DOCS ALBANY AUTHORITIES WHO ORDERED TO THEY DON'T PRESCRIBE OR / AND DON'T GIVE ABREN NOTHING SO THIS IS ON OPEN CONSPIRACY. ABREN ALSO SUFFER OF A GUM / MOUTH GUM DISEASE TYPE INFECTIONS THE WHICH WAS DIAGNOSED IN GREEN HAVEN CF SHH 2013-2014 AND IN SULLIVAN CF SHH IN 2015 WHERE DENTISTS ALLEGED AND ORDERED THAT ABREN NEED DENTAL CLEANINGS EVERY 3 MONTHS FOR TO CONTROL THE DISEASE AND INFECTIONS. HOWEVER THE DEFENDANTS IN GREAT MEADOW CF AND THE DEFENDANTS IN ALBANY AND IN WENDE THEY HAS IGNORED ABREN COMPLAINTS AND ACTED ALSO WITH A DELIBERATE INDIFFERENCE IN THE ISSUES AND PROBLEMS. IN WENDE CF ABREN NEVER WAS ALLOWED TO SEE A DENTIST. AND IN GREAT MEADOW CF AFTER OR FILED SICK CALL SLIP DAILY ABREN WAS ALLOWED TO SEE A DENTIST IN APRIL-MAY 2016 APPROX. BETWEEN 6 TO 7 MONTHS SINCE OCTOBER 2015 TO APRIL-MAY-2016. SO THIS IS VERY CLEAR THE DELIBERATE INDIFFERENCE FROM DEFENDANTS TO ABREN HEALTH, SAFETY, CARE WELLBEING **WELFARE** AND LIFE IN GREAT MEADOW CF/S.

88) THE DEFENDANTS MURDER AND SHU STUCK eg. C.O.s AND SGTs, STARTED TO WRITE MULTIPLE FALSE TICKETS MANIPULATED FABRICATED AND ETAGGEDS 'IN RETALIATION' FOR THE MULTIPLE GRIEVANCE AND COMPLAINTS AGAINST THEM, ABREU AGAIN PLACED IN THE SPECIAL SUIT WITH A SIGN / PLAGUE EXPOSER FRONT HIS CELL. HE WAS MOVED TO THE LAST CELL OF THE SHU (F-1-29 CELL). THE SHU C.O.s WERE BROKEN HIS TOILET FLOODED HIS CELL WITH FECES AND URINES VIA / THROUGH THE CELL VENTILATOR, VIA THE TOILET AND UNDER THE TOILET FROM THE CAT WALK. BEHIND ABREU CELL WHERE ARE THE CONNECTIONS WITH THE TOILET AND SINK THIS HAPPENED LIKE FOUR TIMES OR MORE FROM OCTOBER 2015 TO JULY / 2016. ABREU, NEVER WAS ALLOWED TO CLEAN HIS CELL IN SUCH INCIDENTS NOT WAS PROVIDED NEITHER ANY CELL CLEANING MATERIALS OR ITEMS OR ARTICLES. ABREU WAS ALSO DENIED FOR INTIRED MONTH OF HIS RELIGIOUS KOSHER FOODS / MEALS DENIED OF HIS RELIGIOUS SABBATH FOODS AND PASS OVER FOOD. ALL INTENTIONALLY IN BAD FAITH AND IN RETALIATIONS FOR THE DEFENDANTS MILLER, EASTMAN, THOMAS, PROLOCK, S. LEONARD, TRIESCO, BASQUE, MELERO, NABOENY, CLEVELAND, BIRRELL, LOWRY, BYERS, KELLMAN, DEPAIO AND OTHER STAFF ALSO IN GREAT MEADOW CK AND SUPPORTED AND ALLOWED / PERMITTED BY THE DEFENDANTS IN ALBANY

89) ON 10/28/2015 ABREU WAS ADVISED BY THE DEFENDANTS BASQUE AND LYONS THAT HE NEED TO GO MANDATORY TO THE MTHU (MENTAL HEALTH UNIT) BECAUSE THE OMH CLINICIAN MR IVER ALLEGED THAT ABREU NEED TO GO TO THE MTHU OBSERVATION CELL. ABREU WAS ADVISED THAT HE CANNOT TO REFUSE TO GO TO THE MTHU OBS OR USE OF FORCE WITH A N SPECIAL TEAM WILL BE USED AGAINST ABREU FOR TO FORCE TO HIM GO TO THE MTHU OBS. CELLS.

90) Abreu asked to the Defendants why he need to go to the mth obs cell if he dont have reported to no one that he feel stress or suicide or depressed or reported that he will kill him self to 'no one' However MR Abreu agreed to go to the mth obs. cell. He was escorted to the mth obs. cell by Sgt Lyons (mth obs. cell supervisor). And two big C.O.s/guards Abreu was placed in an inter-view room with the psychiatric nurse Mrs Pink. She acted like she dont know why Abreu was sent to the mth obs. However she was part of this conspiracy. Abreu explained to she that he dont know why he was sending to 'the mth obs. cell'. She got out of the room. The site Sgt (superior of the site) was already in the mth obs. waiting for Abreu so when Abreu **was** in the room Sgt Basile go inside ordered Abreu get up and face the wall. He taken Abreu for his neck and hit Abreu forehead several time with the wall and told Abreu we will go see if you are 'the top big dog' that Doc's Albani say 'that you are'. we dont have video cameras records here.

91) Abreu was escorted to other room (the mth obs. areas where are the cells). There the handcuffs were removed. And also was were present 5 guards/C.O.s. one of they was the C.O. Gonyea. And both Sgts Basile & Lyons. They ordered Abreu to remove all his clothes still he was completely naked. There they assaulted Abreu physical and sexually. They throw Abreu to the floor kicked and punched him also taken him back to the front the wall hit his face and head against the wall hold his both arms and legs. And the Sgt Basile and a big C.O./guard roped & sexually assaulted Abreu front the wall.

92) The Defendants Dascal & Lyons ordered Abren DON'T say nothing to no one about the assaults OR they will kill to him in the Mith obs. cells because there ARE NOT ANY VIDEO CAMERA RECORDS. & NO AUDIO RECORDS neither. Abren was then placed in the last cell of the Mith obs. after the physical AND sexual assaults. APPROX between 10 to 20 minutes after the assaults the Defendants MR Ives was from Abren cell along with a C.O. / guard. He told Abren now DO you UNDERSTAND? Abren REPORT TO MR Ives about the sexual & physical assaults. He showed to MR Ives & to the C.O. present all his injuries AND PAINS AREAS Abren also showed to MR Ives the blood AND asked to they for medical assistance AND HELP. MR Ives JOKED, laughed AND 'SMILED' about all this. AND they REFUSED to assist Abren. MR Ives then added many people believe that you deserve all this 'because you ARE in PRISON FOR ROPE, Listen to me FUCKING ROPE I DON'T will go to assist OR HELP you. 'you ALSO deserve all this. WELCOME TO Great Meadow.' Then MR Ives LEFT along with the C.O. laughed both.

93) ON OCTOBER /29/2015 EARLY IN THE MORNING THE SUPERINTENDENT MILLER AND THE DUS MR ENSTON, WERE MAKING ROUNDS IN THE SITU AND Abren STOPPED TO THEY FRONT THE CELL. They observed Abren lacerations swollen faces, one closed eye / blood shot eye CUTS OVER all his body AND face, also OK 'BRUISES' OVER all his body & face - Abren also showed to they blood on toilet papers coming from his stool AND Abren REPORTED TO they the sexual AND physical assaults but they ONLY told Abren that HE IS A 'SCUMBAG' AND OTHER DIRTY WORDS AND ignored Abren AND they CONTINUED walking AND LEFT THE UNIT.

94) Abreu Reported ONO THE INCIDENT TO THE PSYCHIATRIC NURSE CALLED MS K AND TO THE NURSE HAVENS (MEDICAL NURSE DEPENDANT MS SHERIE HAVENS) BUT SHE REFUSED TO REPORT THE SEXUAL AND PHYSICAL ASSAULTS ALL OR NONE OF ABREU INJURIES AND DON'T ALLOW ABREU SEE A DOCTOR AND GAVE ABREU ONLY TWO (2) TYLENOL AND LEFT THE AREA ALLEGED THAT SHE HAVE OTHER THINGS MORE IMPORTANT TO DO. MS K SHE REPORT THE INCIDENTS TO THE MHA UNIT CHIEF MR JACKSON AND TO THE OMH TEAM AND PSYCHIATRIST MS PAL MR JACKSON COMMUNICATE THE INCIDENT TO MEDICAL WATCH COMMAND THE SUPERINTENDENT MILLER DSI EASTMAN AND FHJD MR KARONDY & NURSE ADMINISTRATOR MS. HARRIS BUT STILL ABREU WAS DENIED ALL CLASSES OF MEDICAL CARE ATTENTIONS EXAMINATIONS AND TREATMENTS EVEN MR JACKSON RN K DR PAL AND A SOCIAL WORKER HAVE OBSERVED THE INJURIES ON ABREU BODY & FEELING OF CHRONIC PAINS.

95) THE DEPENDANT MR PAL RECOMMEND ABREU DON'T SAY NOTHING, KEEP HIS MOUTH QUIET AND SO HE WILL AVOID MOST PROBLEMS. AT TELL TO SHE YOU DON'T KNOW WHO I AM. I DON'T WILL GO TO KEEP MY MOUTH QUIET IF I WILL GO TO REPORT ALL THIS TO THE ENTIRE NEW YORK STATE AND UNITED STATES IF POSSIBLE **I AM** AGAINST **ABUSES** MISTREATMENTS & COVER UP. THEN THE DR PAL SENT BACK TO MR ABREU TO THE SHU ALLEGED THAT IN THE SHU HE WILL BE MORE SECURE AND SAFE THAT IN THE MHA OBS. BECAUSE THE SHU HAS VIDEO CAMERA RECORDS. ABREU WAS THEN ESCORTED BACK TO THE SHU IN NOON OR AFTERNOON TIME BY A FEMALE SGT & TWO C.O.S. THE SGT BASQUE WHEN HE SAW ABREU HE SMILED AND TALKED "NOW DO YOU FEEL BETTER? HA HA HA

96) ON OCTOBER/30/2015 THE DEFENDANT MR BOELL, AN INSPECTOR GENERAL INVESTIGATOR (~~OSI~~ INV.) CAME TO THE SHU AT GREAT MEADOW FROM DOCS ALBANY TO INTERVIEW ABREN ABOUT ONLY THE INCIDENT OF SEXUAL ASSAULTS. SHE ALLEGED THAT SHE DON'T CARE ABOUT THE BEATEN UP PHYSICAL ASSAULTS OR THE INJURIES, BRUISES, OR PAINS IN ABREN BODY. ABREN EXPLAINED TO MR BOELL ALL THE INCIDENT, BUT SHE DENIED ABREN MEDICAL CARE, DENIED ABREN TO SEE A DOCTOR TO GET EXAMINATIONS, DENIED TO SEND ABREN TO AN OUTSIDE HOSPITAL, DENIED ABREN TO GET PREVENTIVE MEDS, DENIED ABREN A HIV TEST, DENIED ABREN A TROUSERS OR AN EMERGENCY TRANSFER, DENIED ABREN TO BE PLACED UNDER HOND VIDEO CAMERAS, DENIED AND REFUSED TO TAKE PHOTOS / PICTURES OF ABREN INJURIES. REFUSED TO PROVIDE OR GIVE PROTECTIONS TO ABREN. SHE ONLY ALLEGED THAT OTHER ~~OSI~~ INVESTIGATOR WILL TO INVESTIGATE THE PHYSICAL ASSAULTS BUT NOT SHE (HOWEVER THAT OTHER ~~OSI~~ INVI. NEVER HAVE YET COME TO INTERVIEW OR INVESTIGATE THE PHYSICAL ASSAULTS). SHE ALSO TRY TO MANIPULATE ABREN AND TRY TO CONVINCE TO ABREN TO SIGN A PAPER LIKE NOTHING HAS HAPPENED THAT DAY, THE WHICH ABREN REFUSED TO DO SO EXPLAINED TO SHE THAT HE WANT TO CONTINUE WITH HIS COMPLAINT, HAPPEN, WHAT HAPPEN.

97) SHE ALLEGED ALSO ABREN THAT DOCS AUTHORITIES HAS DIRECTED TO THEM (INSPECTOR GENERAL OFFICE) DON'T DO NOTHING FOR ABREN DON'T SEND HIM TO AN OUTSIDE HOSPITAL WHEN HE IS PHYSICAL AND SEXUALLY ASSAULTED BY STAFF IN ANY PRISON ALSO, SHE ALLEGED THAT THEY HAS ABREN NAME ON A WALL IN BIG SIDE ON A BOARD, THAT EVERY ONE KNOW WHO ABREN IS IN ALBANY, AND THAT THEY HAS A BIG TABLE & BOXES OF ABREN MULTIPLE COMPLAINTS:

98) Abreu was placed in a special suit one in November / 2015 after the injuries has also disappear or healed Abreu was escorted to the facility infirmary and examined by Dr Korondy and Dr Poolons who denied Abreu all classes of pain medications and advised Abreu that he will not receive nothing in all in Great Meadow CF that that came from Doccs Albany Authorities they asked Abreu "What classes of lawsuits do you have against the Department / Doccs / ?" They told us that we cannot give to you nothing because you have a lawsuits pendants against the Department about on incidents happened to you in Five Points Correctional Facility. Abreu explained to them what classes of lawsuits he has, because Abreu don't have nothing to do **COVER UP** about his pendants lawsuits in the Western District Court and any other courts. Also the Dr Korondy and Poolons alleged that they send Abreu to an outside hospital for any kind of examinations because 72 hours has already passed and by Doccs policy on inmate can be sending to an outside hospital only within of 72 hours of the sexual assaults.

99) Abreu was sending back to his cell without any kind of pain med and medical treatments. The Defendant MR Tibb's he is also a defendant in the pendants lawsuits in Western District Court in Forley and Countryman cases in Five Points CF site. Now he is working in Great Meadow CF such as the first Deputy Superintendent (The second Superintendent) He remembered Abreu and he has threatened Abreu several time. He also is doing the same things that **HE** was doing in Five Points against Abreu **COVER UP** STORR MISCONDUCTS AND DENIED Abreu all classes of medical care.

100) THE DEFENDANTS IN GREAT MEADOW OF HAS PLACED ABREU IN UNLAWFUL RESTRICTED DIETS/LOCKS SINCE NOVEMBER 2015 TO JULY 2016. FOR SEVEN MONTHS ABREU WAS KEPT IN RESTRICTED DIETS. THIS DIETS WERE INADEQUATE WITH LACK OF NUTRITIONS. THE LOCKS NEVER WERE FRESH IT DON'T WAS ONE POUND THE LOCKS WERE ALWAYS HARD. VEGETABLES IF ANY WERE NOT FRESH NEITHER. THE MEDICAL NURSES WERE REFUSED TO MONITOR ABREU REFUSED MANY TIME TO TAKE ABREU BLOOD PRESSURE AND WEIGHT FALSIFIED RECORDS REPORTED FAIR STATEMENTS IN ABREU RECORDS COMPLETELY MANIPULATED. ABREU WAS ALST OF WEIGHT HE REPORT ALST OF TIME TO THEM & TO ALL THE OTHER DEFENDANTS IN GREAT MEADOW AND DOCCU ALBANY, THAT THE LOCKS PROVOKED STOMACH PAINS CONSTIPATIONS, HEARTBURNS BLEEDING VOMITS AND NAUSEAS. BUT IN MANY OCCASIONS THEY IGNORED ABREU OF A FORM DELIBERATE AND INDIFFERENT AND REFUSED ALSO TO STOP THE LOCKS, & PROVIDE ABREU TREATMENTS.

101) THE LOCKS SENTENCES WERE ON OPEN CONSPIRACY AGAINST ABREU BETWEEN THE DEFENDANTS MR IVER MILLER JACKSON, PAUL EASTMAN, DR KARANDY, SGT DASCUE, NABOZNIK, CLEVELAND DEPAKO ANNUNCI, AND BRINNIER AND VENETTOZZI. BECAUSE ABREU ARRIVED TO GREAT MEADOW OF STATE SUCH AS A LEVEL 1 DESIGNED BY OMH. WHILE ABREU IS A MHT LEVEL 1 THE DEFENDANTS CANNOT TO IMPOSE THE LOCKS AGAINST ABREU. ALSO THERE IS A PRIVATE SETTLEMENT BETWEEN DAI AND OMH AND DOCCU CALLED DAI V. OMH/DOCCU. CASE NO. 1:02-CV-04662 SDNY. 2007. THIS PRIVATE SETTLEMENT ALSO TO PROTECT PRISONER(S) DESIGNED SUCH AS LEVEL 1. SO, THE DEFENDANTS IN CONSPIRACY & REPRISAL SENTENCED ABREU TO MULTIPLE SENTENCE OF LOCKS IN BAD FAITH.

102) Abreu had several interviews with the Defendants Ives, Pal and Jackson asked to them why he is placed to restricted diet if he is not supposed to be sentenced to looks because the looks don't apply him by DOC directive 4933 4932 and private settlement in DAE v. OMH/DOCS. The Defendants admitted to Abreu that he is 100% right that he is not supposed to be placed on/ and sentenced to looks but alleged that Great Meadow C.F. regularly they don't care what the courts or judges say that they always doing whatever they want that they regularly don't follow it own policies, directives and regulations and laws. Abreu then wrote multiple grievances and letters of complaints to DOC in Albany to Defendants Annucci, Bellmer, Heywood, Bellamy, Viretto, Brown, Koenigsmann, McCoy, Hamilton, Effman and Hilton. However this Defendants regularly ignored Abreu, ignored his complaints, and refused to resolve the problems acted on a firm deliberate and indifferent trying to cover up Great Meadow C.F./Defendants against Abreu. This Defendants also learned of multiple violations of Abreu constitutional rights and civil rights but they in retaliations in discrimination and intentionally in bad faith approved also the looks for harm Abreu physical and psychologically. Placed Abreu health & safety in an imminent danger.

103) Abreu also appealed all and each of the sentences of looks. Abreu wrote multiple letters or complaints also to the Defendants Miller, Thomas, Eastman, Melicio, Placcek, Harris, Korondy, Nadeau, DePalo, Collins and Cleveland about the looks but they also affirmed the sentences of looks they know that the looks was inappropriate, no adequate no nutritive, & was/were putting sick, and losed weight.

104) Abreu also spoke many time with such defendants above in their rounds in the SHU and reported to them about the looks. However in retaliations and in bad faith for try to avoid a lawsuit, they ordered to OMH staff / Defendants MR Ives MS PAL AND MR JACKSON to change Abreu mental health from level 1 to level 2, and 3, so in that way they can to avoid such claims and place to Abreu under multiple sentences or looks in bad faith so in that way he can be harmed and suffer in form of tortures.

105) Great Meadow of Administration AND OMH Administration to meet each other every 15 to 30 days, for to talk about SHU PRISONERS, DM PRISONERS, ICP PRISONERS. ECT. in the meetings there are the medical and mental health doctors social workers nurses, superintendents deputy security staff ECT. so they planned all this against MR Abreu. DR PAL TOLD Abreu many time, that they has reported to that team about Abreu physical and mental health about the needs of his medical and mental health medications about the cell shield the looks, lack of cell cleaning, staff and nurses MISCONDUCTS against him about the false tickets about Abreu Horrific conditions of confinements, ECT. but she alleged that they always told to they that they don't care about MR Abreu that he need to suffer that he need to be tortured if punished, that they don't care if he die or not die, that they has the hope that he kill himself, Hanged up, she say Abreu that she surprised of the hate that they has against Abreu AND THE CIRCLE OF CONSPIRACY THAT THEY HAS AGAINST Abreu.

106) IN FACT, Abreu MH level was changed TO LEVEL 3 BETWEEN January TO February 2016, IN THAT TIME THE DEARBONTS MILLER EASTMAN THOMAS ANNUCCI BERNIER AND VENEZUELO ORDERED AND APPROVED TO THE HEARING OFFICERS ONLY SENTENCE TO Abreu TO MULTIPLE SENTENCES OF LOOKS (RESTRICTED DIETS) AND GAVE GREEN LIGHT TO THE NURSES AND GUARDS AND SUPERVISORS TO WRITE MULTIPLE FAULTS TICKETS AGAINST Abreu, SO, HE WILL BE SENTENCED TO LOOKS FOR A LONG PERIOD OF TIME SO, Abreu WAS SENTENCED TO MULTIPLE SENTENCE OF LOOKS FOR SIX TO SEVEN MONTHS STRAIGHT. FOR EACH TICKET REPORTED AND ORDERED TO THE MEDICAL NURSES DON'T GIVE Abreu NOTHING DON'T STOP THE LOOKS NO MATTER HOW SICK OR FEELING OF SICK HE REPORT NO MATTER HOW MUCH OR MANY POUNDS HE LOOKS NO MATTER IF HE EAT OR NOT EAT THE LOOK NO MATTER HIS SYMPTOMS, SO, ALL WAS PLANNED BY DEARBONTS.

107) Abreu WROTE MULTIPLE LETTERS OF COMPLAINTS ALSO TO THE DEARBONTS OF OMH AND OMH COMMISSIONER SULLIVAN CENTRAL NEW YORK PSYCHIATRIC CENTER MCCULLACH EXECUTIVE DIRECTOR TO RISK MANAGEMENT'S STAFF HENNING, BARNSTEIN, GRONITZ, WHO ARE IN CHARGE OF THE SATELLITE UNIT OF MENTAL HEALTH INSIDE/WITHIN OF THE DOCS CORRECTIONAL FACILITIES, THE CNRPC AND OMH ARE THE MAIN OFFICE AND CENTRAL OFFICE OF ALL THE SATELLITE UNIT OF OMH STATE WIDE INSIDE OF DOCS PRISONS SO Abreu AND OTHER WATCH DOG AGENCIES AND LEGAL ORGANIZATIONS AND LAWYERS ALSO REPORTED TO THEM (THE OMH/CNRPC & DOCS DEARBONTS) THE MISCONDUCTS ABUSES AND HORRIBLE CONDITIONS OF CONFINEMENT THAT Abreu WAS SUFFERING IN THE HANDS OF GREAT MADDON OF ADMINISTRATION / STATE

108) IN January / 2016 Defendant Lipka was denied sick call services Abreu or not reported his medical complaints or / and not provided Abreu any OTC meds such as Tylenol Aspirin ~~IBUPROFEN~~ OR MEDICIN D. ANTI-ACIDS TREATMENTS FOR HEMORRHOIDS ETC OTC MEDS DON'T NEED ANY DOCTOR APPROVE, OR PRESCRIPTIONS SO WHEN NURSES DENIAL OTC MEDS THIS IS IN HER OR HIS OR THEIR OWN CHOICES AND MISCONDUCTS AND IN THEIR OWN DELIBERATE INDIFFERENCES Abreu WROTE MULTIPLE GRIEVANCE COMPLAINTS AGAINST RN Lipka AND WROTE ALSO MULTIPLE LETTER OF COMPLAINTS AGAINST RN Lipka AND OTHER NURSES (DEFENDANTS). FOR FEBRUARY / 2016 RN Lipka STARTED GAVE ABREU ONLY ONE PACKET (2 TABLETS) OF IBUPROFEN OR TYLENOL THAT IT SHE DIRECTED & ORDERED TO THE OTHER NURSES TO STOP TO PROVIDE OR GIVING ABREU OR DELIVERED ABREU 3 OR 4 PACKETS OF TYLENOL IBUPROFEN MED D OR ANTI ACIDS, ETC BECAUSE THIS LOOK TO SHE 'BOO OR INDIFFERENT TO ABREU MEDICAL COMPLAINTS ABOUT HIS CHRONIC PAINS.

109) THE OTHER NURSES WERE COMING AND SAYING ABREU THAT RN Lipka SHE DENT WANT TO THEY GAVE ABREU MORE OF ONE PACKETS OF OTC MEDS. ABREU WROTE MULTIPLE GRIEVANCES & COMPLAINTS AGAINST RN Lipka THEN RN Lipka IN RETALIATION SHE STARTED ALSO TO WROTE MULTIPLE TICKETS & REPORTS AGAINST ABREU NOT WITH THE SHE GUARDS SUPPORTED & COVERED UP BY DEFENDANTS BASCO LOWRY, CLEVELAND, WILLIAMS, NABOZNY, DE POLO, PLACOCK, THOMAS, EASTMAN, MILLER, HARRIS, KORONOV, COLLINS, KORNIGSMAN, ANNUNCI, MELECIO, BELIMIER, BELKOMY, SGT BEEBE, BIRRELL, & HEARING OFFICERS, EVEN VIDEO TAPES SHOWED THAT ABREU NOT WAS GUILTY THEY FOUND ABREU GUILTY OF OVI.

110) Abreu continue reported Lipka misconducts and retaliations against him. Then the medical nurses such as the defendants Havens, Rogue, La Fresch, Von Order, Watkins, Boice, Brunelle started little to 'little' for the months of March / April 2016 to denied Abreu all classes of OTC meds. They were continue coming front Abreu cell (some time they came & some time they don't come front Abreu cell) but don't were bring any OTC meds to Abreu in all, only RN Lipka was bringing OTC meds to Abreu when she want to do so. The reasons was a plan and conspiracy between the nurses, the nurse administrator Horris, Dr Korondi and Dr Poolons. For that all looks that RN Lipka was provided Abreu medical care so to cover up her misconducts against Abreu to the some time so all was a trick, for that the grievance and complaints that Abreu was filing against RN Lipka or / and the other medical staff appear like without merits or unfounded claims. The some things with the weight and blood pressure during the lock sentences, RN Lipka was the unique doing it. The other nurses were refuse to do so, and the some with the sick call services.

111) in the began / beginning of May / 2016 (Abreu believe between May / 10 - 16 / 2016) RN Lipka came front Abreu cell to take blood pressure and / or weight because Abreu was placed in lock sentence. The C.O.s Short, Weston and Dickinson were escorted to she. Once time Abreu was out of his cell RN Lipka started to threatened Abreu, yelling & screaming at him saying to him, 'you wrote me other grievance complaint. Now, you don't will go to receive no OTC meds, in all, no nurses will go come front your cell no more during the now you don't will go get shit in all no more, do you!'

112) The Defendant LIPKA also added, Oh And Listen Me **I** will go to make sure that you never get NO MORE PAIN MEDS IN ALL STOP OF PUTTING 8 filed sick call slips you don't will get your MEDS back, that you was received in other PRISONS / JAILS, you don't will go GET here NOTHING IN ALL. The C.O.s Short, Weston AND Dickinson TOLD TO RN LIPKA TO STOP AND BE QUIET. 'SO, she STOP, Abren was placed back to his cell AND they left the Area, she denied sick call Abren too.

113) AFTER THAT THREATS AND INCIDENT, THE NURSES / DEFENDANTS ROGUE LaFRENCH BRUNER. VAN ORDER, WATKIN Havens, AND BOICE DENIED Abren all classes of sick-call services all classes of otc meds. AND never again took Abren weight or blood pressure. They ARE denied Abren openly all classes of sick call services since the month of MAY / 2016 TO THE PRESENT JULY / 2016 Abren don't have in this time any kind of access to medical care Abren have reported in his sick call slip / request Asthma Problems, Chest Pains, Respiratory Problems, Chronic back pains, Hand (Right Hand & Right Arm Pains), Toes Pains Throat & ~~EAR~~ PAINS DUE TO INFECTIONS, Pain in his neck due to the padlock of the special suit of cell to TINY / small the need of his back support Hand support orthopedic boots his eye glasses / Dark / tinted Lenses. Need for Physical Therapy, Dental cleaning every 90 days due to mouth Gum Disease the need of his T.B. Meds, Strong Headaches (Migraines) Hemorrhoidal Bleeding / Pains AND Rectal Skin Drying, Need Lotions or Creams, Need a OR Arm injury but nurses has ignored Abren, the doctors refused see him, AND nurses are not reported his complaints.

114) Abreu believe that the Defendants nurses Are throw away all his sick call slips/request or part of they AND NO REPORTED MANY OF Abreu Complaints in the sick call slips, RN Lipka she stopped also to bring or provide Abreu ANY classes or OTC meds, also in Retaliation, for Abreu grievances AND complaints against she

115) THE DEFENDANTS DR POOLONG AND DR KARANDI HAS LONGER MONTHS REFUSED TO SEE ABREU SINCE THE MONTH OF MARCH OR APRIL 2016 TO THE PRESENT JULY 2016 THEY HAVE REFUSED TO SEE & EXAM ABREU. ALL & EACH TIME ABREU HAS SAW TO DR POOLONG HE ALWAYS TO DISRESPECT ABREU, CALLED ABREU A PERVERT EVERY TIME HE SAW ABREU WEARING THE SPECIAL CONTROL SUIT, REFUSED TO EXAM TO MR ABREU REFUSED TO ADDRESS & RESOLVE ANY MEDICAL COMPLAINTS REFUSED TO ADDRESS ABREU MEDICAL NEEDS REFUSED TO PRESCRIBE ABREU PAIN MEDS AND OTHERS TREATMENTS FOR ABREU T.B /tuberculosis AND Hemorrhoidal / bleeding HE NEVER HAS EXAMINED ABREU RECTAL / RECTUM STOOL ABREU SKINS NEVER HAS TAKE ANY TEST OF ASTHMA NEVER HAS TOUCHED ABREU BODY NEVER HAS EXAMINED ABREU RIGHT HAND, OR ARM, back neck OR / AND LEFT ANKLE / FOOT. NEITHER HE ONLY KEEPING SAYING ABREU your medical records continue under review. AND OTHER DAY, you never will go get back from me your pain meds. ORTHOPEDIC BOOTS HAND BRACE OR back support. HE USE DIRTY WORDS & DISCRIMINATORY WORDS AGAINST ABREU HE DONT ALLOW ABREU TO TALK, AND ONLY HE SAW ABREU FOR FEW MINUTES AND SEND ABREU BACK TO THE SHED & OTHER DAY HE ALLEGED THAT DUCU ALBANY & FACILITY ADMINISTRATION ORDERED HIM DONT GIVE ABREU NOTHING IN ALL.

116) Abreu, Lipitor AND Claritin MEDS. WERE THE ONLY MEDS. THAT WERE AGAIN RE-PRES. - CRIBED BACK IN THE MONTH OF MARCH OR APRIL 2016 AFTER ABREU WROTE MULTIPLE LETTERS OR COMPLAINTS AND GRIEVANCES. AND BETWEEN MARCH OR APRIL 2016 ABREU WAS ALLOWED TO SEE THE DR. ARLIS IN A MEDICAL TRIP TO SULLIVAN CF BECAUSE DR. ARLIS WAS WHO CONDUCTED 'ABREU HAND SURGERY' IN THE MONTH OF JULY /2015. MR. ARLIS TOLD ABREU THAT THE HAND DON'T HAVE HEALING YET. THAT STILL IT LOOK PINK COLOR THAT HE NEED PHYSICAL THERAPY A HAND BRACE AND PAIN MEDS. MR. ABREU EXPLAINED ALL THE LIMITATIONS THAT HE HAS WITH HIS HAND THE PAINS; THE PROBLEMS FOR WRITE FOR TO DO DIFFERENT ACTIVITIES THE PROBLEMS IN HOLDING A WRITE PEN. WITH HIS RIGHT HAND ABREU TOLD & EXPLAINED TO DR. ARLIS THAT THE ONLY WAY ABREU CAN WRITE IS RIPPED A T-SHIRT LIKE A BANDAGE AND APPLIED IT VERY TIGHTLY TO HIS HAND, AND PLACED THE PEN IN A DIFFERENT POSITIONS, AFTER THAT HE IS COMPLETELY UNABLE COM TO WRITE IN THE NORMAL WAY.

117) HOWEVER EVEN AND THE DR. ARLIS PRESCRIBED AND RECOMMEND PAIN MEDS A HAND BRACE AND PHYSICAL THERAPY. THE DR. POOLONG, DR. KORONIX, SUPT MILLER, MR. THOMAS, MS. PROCK; THE DEFENDANTS IN DOJ ALBANY CENTRAL OFFICE, DR. KORNIGSMANN. THEY REFUSED TO FOLLOW THE DR. ARLIS (HAND SPECIALIST / ORTHOPEDIST) ORDERS PRESCRIPTIONS AND RECOMMENDATIONS. THE DR. POOLONG, TOLD ABREU THAT HE CALLED BACK TO DR. ARLIS AND MADE SURE THAT HE CHANGED THE PRESCRIPTIONS AND RECOMMENDATIONS BECAUSE HE WILL MAKE SURE ABREU DON'T GET NOTHING. ALSO ABREU WAS DENIED COPIES OF THE MEDICAL RECORDS.

118) When Abreu was sexually & physically assaulted in the month of October / 2015 the Defendants Boice, Von Order, Havens and Watkins and Roger refused also intentionally report Abreu complaints pointing assaults and injuries of the sexual and physical assaults even Abreu filed sick call daily in the following days after the assaults and even Abreu showing to them the injuries over all his body and face and the facility administration refused to take photos / pictures of Abreu serious injuries trying to cover up the assaults and nurses cover up and misconducts and nurses don't reported in Abreu medical records the injuries or what he also reported to them in the sick call slips & verbally all an open conspiracy, Retaliations and open discriminations against Abreu.

119) The Defendants Sgt. Beebe, Kevinlan Bellomy, Hale, Miller, Melcio, Thomas Eastman, Annucci, Hilton and McCoy and Herwood has also an open conspiracy with Abreu grievance complaints and grievance appeals. They has placed Abreu in limited filing of grievances and appeals. Regularly they only process one or two grievances in the weeks the rest they missing it or throw away it or not process it they pick up what grievance complaints they will go to accept or file or process and which grievance or appeals they will to process and not to process. They every each weeks missing not process not file. neither many of Abreu grievances & appeals that he sent to the IGP office along with copies to Dover Central Office (the Defendants above) and copies to Supt. Miller Melcio. Eastman (Great Meadow Defendants, but they sent many of it copies back to Abreu

120) The Defendants Miller, Beebe, Kunkin, Meleud, Eftton, Thoms, Easton, Collins, Koonigsmann, Peacock, Hollman, Brilomy, Morris, Halse, Heywood, Chief of OSI, Hilton, Montes, Annico, Bruen, Hickox, Jackson, Docu/OHH/NYS, has showed an open deliberate indifference to Abreu grievances and complaints and appeals they through of it grievances/complaints and appeals, has learned of OI and each violations that Abreu has suffered at Great Meadow C/Situ, has learned of the Constitutional Rights violations of the Civil Rights Human Rights and of the violations of its own Docu/OHH Policies Rules Regulations Directives Manuals and state and federal laws. So they don't have any excuses. They have instead returned back to Abreu all appeals that Abreu has senting to they appealed to the next level eg. Superintendent and CORC under the state regulations but they alleged that they only follow Docu Directive #4040 of Correction Law §139. Not the grievance regulations under Title 7 NYCRR and Title 9 NYCRR and that Docu Directive #4040 don't allow Abreu to appeal to the next level in his own if it don't allowed Abreu to send copies of his grievances and appeals to the Docu Central Office directly to them. However even Abreu senting it directly to the IGRC/IGP Clerks, IGP Supervisors, IGRC/IGP Sgt Beebe they don't process it, nor the Sup-Miller neither.

121) Additionally the IGP Supervisor Mrs. Kunkin she has refused to make rounds in the situ, refused to put or place a secured locked box for the grievances complaints in the situ, and she don't respond neither to letters.

122) MR ABREU LETTERS AND GRIEVANCES ARE REGULARLY MISSING. THE DEFENDANTS REGULARLY ALLEGED AND INFORMED THAT THEY DON'T HAVE RECEIVED ABREU GRIEVANCES OR LETTERS. THE COURTS AND JUDGMENTS WOLFORD ALLEGED THAT SHE OR HER CLERK DON'T HAVE RECEIVED SEVERAL LETTERS OF MR ABREU. SO THIS IS VERY ~~CLERK~~ **CLERK** THE STH SUPERVISORS, GUARDS & STAFF, ARE IMPEDDED AND PLAYING GAMES WITH ABREU OUTGOING CORRESPONDENCE / MAILS AND INSIDE MAILS. SO A LOCKED SECURED MAIL BOX IS COMPLETELY NECESSARIES IN GREAT MEADOW CF ALL AND EACH OF OTHER DOES PRISONS (STATE WIDELY) SUCH SUCH FIVE POINTS CF, CLINTON CF STH, WOODS CF STH, GREEN HEAVEN CF STH, 'SING-SING CF' UPSTATE CF STH, SULLIVAN CF STH, 'ALL THE S-BLOCK' AND SOUTHPORT CF D-BLOCK, ELMIRA CF STH, EASTERN CF STH, ATTICA CF STH, AUBURN CF STH, HAS A MAIL BOX & GRIEVANCE BOX SECURED WITH A LOCK WHO ONLY THE CORRESPONDENCE UNIT GRIEVANCE SUPERVISOR AND STH SUPERVISOR HAS THE KEYS OF IT BOXES, BUT GREAT MEADOW CF STH DON'T HAS ANY SECURED MAIL OR/AND GRIEVANCE BOXES LOCKED WITH A LOCK OR PADLOCK. INMATES AND ABREU ARE FORCED TO PUT HIS OR THEIR/THEIR MAILS/LETTERS/CORRESPONDENCES DIRECTLY ON THE CELL BARS WHERE THE C.O'S PICK UP IT IN THE MORNING. SO THEY HAS DIRECTLY CONTACT WITH OUR MAILS WITHOUT ANY SUPERVISIONS, AND WITHOUT ANY PUNISH TO THEIR MISCONDUCTS.

123) MANY PRISONERS IN GREAT MEADOW CF STH FOR YEARS HAS REPORTED THE MISSING OF THEIR LETTERS & GRIEVANCES, BUT THE DEFENDANTS HAS COVERED UP ALL THIS, AND IGNORED THIS CLAIMS & COMPLAINTS. SO THIS IS VERY EASY FOR THE STH C.O'S/STAFF TO THROW & MISSING MAIL

124) Abreu Had a video conferences with the Hon. Elizabeth A. Workard in the month of December 2015 AND January / 2016 along with the N.Y.S. Attorney General Assistant AND the assigned Probation Counsel for the cases Abreu v. Farley et al 11-CV-6251. Abreu explained to the court the problems in he received legal supplies legal packages AND mails also Abreu explained the problems he having with the Defendants AND the problems in having access to his legal materials where the Defendants has denied Abreu his 27 bags of legal materials with where the court allowed to Abreu receive one having in his cell 22 bags of legal materials AND Sullivan the allowed five bags of legal materials Abreu also reported to the court that others such prisoners have listen Abreu stopped many time to the Defendants in their rounds in Great Meadow of the AND explained the misconducts of staff / guards about legal supplies carbon papers of low library Defendants misconducts also Abreu asked to they for access to his legal materials but that the Defendants ignored Abreu complaints / request.

125) Since December 2015 / January 2016 to the present July 2016, nothing has changed the Defendants continue with their open misconducts open retaliations open discrimination open abuses open white supremacy issues open deliberate indifference to Abreu rights laws AND constitutional rights open abuses of power AND authorities open corruptions open conspiracy AND openly trying to harm Abreu with unusuals AND cruel punishments, AND other open many misconducts / abuses

126) The Defendants also refused to wash the special control suit every time Abreu walk to the shower the suit it is in the floor it never has be washed & where it is placed is where prisoners are strip searched inside of the strip room. When they come to the site so every one stand there so the suit it is keep on the floor in that area. After Abreu is forced to wear it suits all it is filthy and anti hygienic acts, the Defendants then doing all this intentionally for harm and humiliate Abreu. Abreu has now rash and alot of itches and problems in his skin wearing it filthy suits, regular unwashed and stinked like shirts they never has sent it suit to the laundry. to the present of it lawsuit Abreu continue be forced to wear it suits continue unable can to clean his cell toilet sink floor ventilator (the ventilator it don't work in all). The cell shields/plexiglass continue front Abreu cell no hot water no bucket and and deprived of headphones & the cell is too hot.

"Abreu, security, safety, wellbeing; Life care, Health, AND welfare are in an imminent and serious danger & deprived of all access to healthcare"

127) The Defendants Buscè, Dellinger, Venturoli, Annucci, Bellomy, Hale, Heywood, Harris, Ives, Pac, Jackson, Poolona, Karandy, Feresco, Thom, Bruen, Madorn, DePaolo, Gonyea, Watson, Molecio, Easton, Cleveland, Königsmann, Beebe, Collins, Williams, Birrell, Scanlon, Vladyka, Lowry, Byars, Leonard, Keilman, Peacock, Boice, Mckoy, Lipka, Rogier, Lafrech, Pink, Leclaire, Von Order, Watkins, Sullivan, Brunelle, Hollman, Hilton & Chief of all, Has all & each of they knowledges about all this violatio abuses; tortures, discrimination, reprisals & harassment against

128) THE DEFENDANTS MILLER - EASTMAN, ANNUNCI, BOINIER, HICKOY, MELITO, THOMAS, WILLIAMS, SCORCON, VLADYKA, LOWRI, BYERS, KELLION, COLLINS, CLEVELAND, DEPAO, LYON'S, MABOENI, BASCH, PEACOCK, VENETTIZZI, HILTON, DELON, HALE, HERWOOD, BROWN, BREBE, AND DOCCS DENIED ABREU HIS PASS OVER MEALS THEY DON'T ALLOWED ABREU INTERNATIONALLY IN GOOD FAITH; IN RETALIATIONS AND DISCRIMINATIONS TO PARTICIPATE IN THE JEWISH PASS OVER, ALLEGED THAT ABREU HAS SENTENCES OR RESTRICTED DIETS IN MAY/2016, WHEN THE PASS-OVER STARTED. HOWEVER THE DOCCS DIRECTIVE # 4933 SITU. SECTION 304.2 1b, (ENCLOSURE) STATE THE FOLLOWING BELOW

" A PRE HEARING RESTRICTED DIET OR RESTRICTED DIET DISCIPLINARY SANCTION SHALL BE SUSPENDED DURING THE PASSOVER HOLIDAYS FOR AN INMATE WHO IS DESIGNATED AS JEWISH IN ACCORDANCE WITH DIRECTIVE # 4202 "RELIGIOUS PROGRAMS AND PRACTICES".

129) ABREU SHOW THE DIRECTIVE 4932 & 4202 TO ALL AND EACH THE GREAT MEADOW OF DEFENDANTS ABOVE. IN THEM SITU ROUNDS ABREU WROTE SEVERAL LETTERS AND COMPLAINTS TO THE DEFENDANTS IN GREAT MEADOW OF AND TO ALL AND EACH OF THE DEFENDANTS ABOVE FROM DOCCS CONTROL OFFICE. HOWEVER THEY REFUSED TO ALLOW & LET ABREU TO PARTICIPATE IN THE PASS-OVER. REFUSED TO RESOLVE THE PROBLEMS, IGNORED ABREU - COMPLAINTS AND RIGHTS. ACTED AS IF A FORM DELIBERATE AND INDIFFERENT TO ABREU RIGHTS. RELIGIOUS BELIEF, RELIGIOUS PRACTICES, & IGNORED THE DOCCS DIRECTIVES. ABREU FIRST AMEND RIGHTS. GRILLANCE COMPLAINTS. DUE PROCESS & FEDERAL LAWS/REGULATIONS ABOUT RELIGIONS, SUCH AS THE RFRA & RLUIPA

130) The DOCS AND THE DEFENDANTS IN CENTRA OFFICE AND GREAT MEADOW CF HAS CHANGED THE 'CAD KOSHER MEALS / FOODS' FOR REGULAR MEALS / REGULAR FOODS THAT ARE NOT KOSHERS AND THAT VIOLATE THE JEWISH LAWS JEWISH INTENTIONAL LAWS ABOUT KOSHER MEALS / FOODS. THE DEFENDANTS INTENTIONALLY AND IN BAD FAITH HAS CHANGED THE KOSHER MEALS / FOODS FOR NO JEWISH FOODS / MEALS ONLY BECAUSE THEY ARE ANGRY MOD & UPSET THAT ALOT OF PRISONERS IN THE SHU, HAS CHANGED THEIR RELIGION TO JEWISH RELIGION THE WHICH THEY ALLEGED THAT THEY BELIEVE THAT IT IS ONLY FOR THE FOODS AND ALLEGED THAT THEY ARE SPENDING TOO MUCH MONEY IN CAD KOSHER MEALS. SO THE PLAN OF THEY WAS VIOLATE PRISONER'S JEWISH RIGHTS & BELIEFS, FOR TO FORCE TO THEY TO GET OUT OF CAD KOSHER MEALS OR KOSHER MEALS AND GO BACK TO REGULAR FOODS SO, THEY IN BAD FAITH ARE PROVIDED ABRAHAM NOW BAD FOODS THE WHICH CLEARLY IT IS NOT KOSHER MEALS. THEY STARTED ALL THIS NOW IN THE MONTH OF JULY/16

131) IN GREEN HAVEN CF / SHU FOR EXAMPLE THEY ALLOW TO JEWISH PRISONERS, AND THOSE WHO ARE DESIGNED SUCH AS JEWISH IN THEIR RELIGION TO PICK UP BETWEEN CAD OR HOT KOSHER FOODS / MEALS. BECAUSE GREEN HAVEN CF / SHU HAVE BOTH 'KOSHERS MEALS CAD KOSHER AND HOT KOSHER MEALS. IN GREAT MEADOW CF JEWISH CASES, SUCH AS ABRAHAM CASE, THEY FORCE HIM TO PICK UP ONLY THE NEW REGULAR FOODS THE WHICH THEY CALL HOT KOSHER MEALS, THE WHICH IT IS VERY DIFFERENT TO THE HOT KOSHER MEALS IN GREAT MEADOW. I DON'T GIVE ABRAHAM ANY OTHER CHOICE OR KEEP IN CAD SO, THE DEFENDANTS HAS VIOLATED ABRAHAM RIGHTS.

132) The Defendants PAC Ives AND Jackson has an open 'deliberate indifference' TO Abreu Society wellbeing core Health welfare 'security' They has twice DISCONTINUE all PSYCHIATRIC MEDS FOR STRESS DISTRESS DEPRESSION LACK OF SLEEP FLASH BACK ~~AND~~ LACK OF CONCENTRATIONS 'DUE AND TO THE PHYSICAL AND SEXUAL ASSAULTS AND DEFENDANTS MULTIPLE MISCONDUCTS AGAINST ABREU AND THE HORSEY CONDITIONS CRUEL & UNUSUAL CONFINEMENTS AND PUNISHMENTS IN THE SHU (S). They DISCONTINUE ABREU PSYCHIATRIC MEDS IN APRIL /2016 IN RETALIATIONS BECAUSE THEY ALLEGED THAT ABREU HAS EXPOSED HIMSELF TO A MENTAL HEALTH NURSE AFTER THAT ABREU FILED MULTIPLE LETTER OF COMPLAINTS INSIDE AND OUT OF PRISON, Legal organizations CNYPC DOCS / OMH 'ect. The Defendants ABOVE RESTORED ABREU PSYCHIATRIC MEDS IN MAY /2016 RE-PRESCRIBED IT BACK. THEN IN JUNE /2016 THEY AGAINST ABREU IN RETALIATIONS AGAIN TO DISCONTINUE all his PSYCHIATRIC MEDS, WITHOUT ANY EXPLANATIONS, ADVICES, NOTICE, NOTIFICATIONS.

133) Abreu WROTE SEVERAL COMPLAINTS AGAINST THE DEFENDANTS ABOVE AND ASKED WHY ABREU MEDS. WERE DISCONTINUE THE DEFENDANTS PAC Ives, AND JACKSON TOLD ABREU THAT THEY CONTINUE his MEDICATIONS IN REPRISAL BECAUSE A MENTAL HEALTH NURSE / PSYCHIATRIC NURSE ALLEGED THAT ABREU SENT TO HER AN INAPPROPRIATE LETTER THIS NURSE WAS THE DEFENDANT MS LECLOIRE. When Abreu MAKE COMPLAINTS THAT THIS ARE NOT REASONS FOR TO DISCONTINUE his MEDICATIONS THEN THE DEFENDANTS USED TO THE NURSE MS PINK ALLEGED THAT ~~THE~~ OBSERVED ABREU NOT TAKE his MEDS SPITTING IT INSIDE OF A CUP, AND AFTER MR Ives ALSO 'WROTE A FALSE STATEMENT ALLEGED THAT ABREU DONT WANT his MEDS.

134) This is an open conspiracy, AND COVER UP. Against Abreu, FIRST ALLEGED LEWD CONDUCT SECOND ALLEGED A LETTER TO A NURSE AND THIRD ALLEGED THAT THE NURSE OBSERVED ABREU SPIT IT MEDS INSIDE OF A CUP AND FOURTH NOW ALLEGED THAT ABREU TOLD TO MR IVER THAT HE DONT WANT HIS MEDS. ABREU EXPLAINED CLEARLY TO MR JACKSON AND MR POL THAT MR IVER STATEMENTS ARE FALSE MANIPULATE AND FABRICATED. HE ALSO ACCUSED ABREU OF STALKING TO RN BLOIRE. HOWEVER ON 10/28/2015 MR IVER ALLEGED THAT HE SENT ABREU TO THE MH OBSERVATION, BECAUSE ABREU REPORTED HIM THAT HE WILL TO VIOLATE (ROPE) AND ASSAULT TO THE GRACIA LIBRARY LIBRARIAN MS BORROW AND ANAETH STAFF. MR ABREU NEVER GIVE THIS STATEMENT TO MR IVER. HE DID SO ONLY FOR HE (MR IVER) TRY TO COVER UP THE REASONS WHY HE SENT ABREU TO THE MH OBS. CELL, WHERE ABREU WAS PHYSICALLY AND SEXUALLY ASSAULTED AND ROPED BY GUARDS & SUPERVISORS & FOR TRY TO COVER UP HIS OWN MISCONDUCTS AGAINST ABREU FOR DENIAL ABREU MEDICAL CARE, REFUSED TO REPORT THE INCIDENTS (COVER UP STAFF MISCONDUCTS) NOW HE USE TO THE MH NURSES FOR WRITE AND FALS STATEMENTS AGAINST ABREU, AND DISCONTINUE SO, HIS MH. MEDS.

135) THE DEFENDANT MR IVER ALSO DONT ALLOW TO ABREU TO TALK ABOUT THE SEXUAL & PHYSICAL ASSAULTS THAT HE HAS SUFFERED. HE DENIED ABREU ALL CLASSES OF MENTAL HEALTH PROGRAM & TREATMENTS AND HE ALSO WROTE IN ABREU MENTAL HEALTH RECORDS, THAT ABREU TOLD HIM THAT HE WILL TO EXPOSE HIMSELF TO ALL FEMALES & MALES STAFF, FOR SO, HE CAN GO TO A PROGRAM. THIS IS NOT TRUE IN ALL

136.) The Defendants MR Ives, POC, Jackson, Pink, AND Leclair ARE A CLOR & -
 OFA DELIBERATE INDIFFERENT TO ABRON
 SAFETY SECURITY HEALTH CARE WELLBEING
 WELFARE AND LIFE. THEY HAS PLACED TO
 MR ABRON IN AN IMMINENT DANGER
 MR ABRON WILL KILL OR HARM HIMSELF
 FOR THE DISCONTINUATIONS OF HIS MH MEDS
 THE WHICH HE NEED. HE CANNOT SLEEP
 WITHOUT IT. HE CANNOT CONCENTRATION
 WITHOUT IT, HE ALSO FEEL STRESS &
 DEPRESSED AND DISTRESSED & SUFFERED
 A LOT OF FLASHBACK WITHOUT HIS MEDS.
 BUT THE DEFENDANTS ONLY THINKING IN
 RETALIATIONS AND UNUSUAL AND CRUEL
 PUNISHMENTS AND ACT OF A FORM
 COMPLETELY UNPROFESSIONALS AND WITHOUT
 ANY ETHICS IN ALL.

137.) The Defendants COLLINS, ANN MORRIS
 SULLIVAN, McCULLACH, O'HAN, DOUGS, ADAMS
 ANNUCCI, MILLER, KÖRNIGSMANN, HILTON,
 MENNING, GRANT AND JACKSON
 HAS FURTHER KNOWLEDGES ABOUT MR Ives
 MS POC, PINK AND Leclair MISCONDUCTS
 AND RETALIATIONS AND DISCRIMINATIONS
 AGAINST MR ABRON. ALSO RN PINK ALSO
 OF TIME SHE DENIED ABRON MH MEDS.
 ALLEGED THAT MR ABRON HAS REFUSED
 HIS MEDS WHEN THIS IS NOT TRUE IN ALL
 AND SHE INCOURAGED OTHERS MH NURSES
 TO DO SO TOO. RN PINK SHE WAS ALSO PART
 OF THE CONSPIRACY AGAINST ABRON ON 10/28/
 2015 WHEN HE WAS PHYSICAL AND SEXUALLY
 ASSAULTED BY DEFENDANTS BASCO, LYONS & MHA COS.
 BUT SHE DONT REPORTED NONE OF THIS. THEY (RN PINK &
 Leclair) REGULARLY HAS FURTHER KNOWLEDGES OF MANY INMATES
 WHO HAVE BEEN ASSAULTED IN MHU OBS. BUT THEY COVERED UP ON THIS TOO.

138) The Defendants MR Ives also has ordered to the mental health social worker, MS H. MCCARTHY that she don't stop from Abreu, that she don't talk with Abreu front his cell. neither He has ordered or required to the SHU counselor MS WINNEY a similar request including to the ISA PROCOCK AND THE ASSISTANT OF MENTAL HEALTH SERVICES MS COLLINS that Defendants denied Abreu regularly all classes of counseling services, all classes of mental health services and others services in the SHU. MS HOLLY MCCARTHY she walk in the SHU in DMH rounds in least 2 or 3 times in the week ORC MS WINNEY she walk five (5) times in the weeks in the SHU AND Defendants MS COLLINS & MS. PROCOCK in least one time in the weeks, but they refused to talk with Abreu to stop front his cell AND denied him all services & ignored him AND his complaints regularly. So Abreu is discriminated AND treated very differently to other inmates in the SHU. in some or similar situations, this Defendants also if walk near or front of Abreu cell are only escorted by SHU guards / cars who always harass Abreu & threats him & listen & watch the conversations but they don't escorts to WINNEY, MCCARTHY, PROCOCK & COLLINS to the cells of others prisoners, no matter what they did in SHU.

139) The Defendant WHITE, she always denied Abreu all video tapes & audio records that Abreu has asked & required to she via the FOIL request she regularly don't answer AND respond to Abreu FOIL request AND she has learned of the violations AND has further knowledge also of the violations when Abreu explained it in the FOIL request, including the Denial sickcall.

140) IF THE DEFENDANTS WHILE SHE LEARNED OF A VIOLATION (CONSTITUTIONAL VIOLATIONS THROUGH OF A REPORT, REQUEST, LETTER, VIDEO TAPES & AUDIO RECORDS BUT SHE TRY TO COVER UP ALL THIS VIOLATIONS, BY DENIED ABREU COPIES OF THE VIDEO TAPES & AUDIO RECORDS, OR SHE REFUSED TO PRESERVE IT EVIDENCES AND REFUSED OR DON'T ALLOWED ABREU TO REVIEW IT VIDEO TAPES, AUDIO RECORDS AND/OR DOCUMENTS THEN SHE IS PART OF THE VIOLATIONS OF ABREU CONSTITUTIONAL RIGHTS, AND SHE BECOME ALSO LIABLE OF ALL THE VIOLATIONS. I HAVE WRITE MANY TIME TO DEFENDANTS WHILE ASK TO SHE TO PRESERVE THE VIDEO TAPES & AUDIOS OF THE MEDICAL AND MENTAL HEALTH NURSES DENIED ABREU HIS MEDICATIONS OR REFUSED TO DELIVER IT ABREU, OR DENIED ABREU SICK CALL SERVICES, OR INCIDENTS OR VERBAL ASSAULTS, THREATS, HARASSMENTS OR SEXUAL HARASSMENTS BY GUARDS IN THE SHU. ASKED TO REVIEW ALL ABREU GRIEVANCES/APPEALS & COMPLAINTS AND OTHER MANY REQUEST AND SHE REVIEWED IT READ IT OBSERVED THE INCIDENTS BUT SHE REFUSED TO PROVIDE IT ABREU, WITH THE ONLY PURPOSE OF COVER UP STAFF ABUSES MISCONDUCTS VIOLATIONS AND FOR AVOID THAT ABREU USE IT INFORMATION, EVIDENCES & PROOFS IN LAWSUITS COMPLAINTS & INVESTIGATIONS SO, SHE BECOME LIABLE OF THE VIOLATIONS TOO.

141) THE DEFENDANTS MR BRUNS AND HEYWOOD AND ANNUCCI HAS IGNORE ALL ABREU COMPLAINTS AGAINST MS WHITE HAS IGNORED ABREU APPEALS OF THE FOIL REQUEST NOT PROVIDED & THOSE DENIED BUT THEY HAS ALSO REFUSED TO PROVIDE ABREU RESPONSE & ANSWER TO HIS APPEALS, THEY ARE ALSO LIABLES OF CONSPIRACY & VIOLATIONS OF ABREU RIGHTS

142) The Defendants MR THOMAS AND MS PENECK ALLEGED ABRON THAT HE HAS ACCESS TO HEALTH CARE BECAUSE ALL THE NIGHTS THE NURSES TO DELIVERY TO HIM HIS MEDS, LINDICE & CLORIDIN. HOWEVER THIS DEFENDANTS ALLEGATIONS DON'T HAVE ANY MERITS IN ALL. WE HAVE TWO KIND OF NURSES IN THE SHU, ONE WHO DELIVERY MEDICATIONS IN THE SHU WHO ALSO PICK UP THE SICK CALL SLIPS, REQUEST FROM THE CELL BARS ESCORTED BY SHU GUARDS FOR SICK-CALL SERVICES NEXT DAY IN THE MORNING. ALL SICK CALL SLIPS ARE PICKED UP IN THE NIGHTS. AND WE HAVE THE MEDICAL NURSES WHO CONDUCT SICK CALL SERVICES IN THE SHU. THE NURSES WHO DELIVERY MEDS IN THE SHU, REGULARLY DON'T TALK OR SPEAK WITH INMATES DON'T STOP FRONT INMATE CELLS THAT DON'T RECEIVE MEDS. AND THEY ALWAYS HAS BAD ATTITUDES AND WHEN THE INMATES IN THE SHU TRY TO TALK WITH THEM THEY YELL OR SCREAM TO THAT INMATES ALONG WITH THE COS. THAT ARE SICK CALL SLIPS IF THEY HAS ANY MEDICAL CONCERN/PROBLEMS.

143) EMERGENCY SICK CALL IN THE SHU IS ONLY CONSIDERED CHEST PAINS IF THAT IS NOT CHEST PAINS. NURSES DON'T STOP FRONT AN INMATE CELLS. IF THE MEDICAL CONDITIONS IS OTHER ISSUES PROBLEMS RATHER THAN CHEST PAINS. THEN THE NURSES DIRECT TO THE INMATES TO FILE SICK CALL SLIP & THE SHU COS/GUARDS DIRECT THE SAME TOO. SO ABRON CAN SEE THE NURSES 100 TIMES DURING MEDS. AND THAT DON'T MEAN NOTHING IN ALL ALSO THIS NURSES READ DIARY/DAILY ABRON SICK CALL SLIPS SO THEY KNOW THE PROBLEMS & THEN ARE THE SAME NURSES WHO ALSO DENIAL ABRON SICK CALL SERVICES. & DON'T PROVIDED HIM NOTHING IN ALL, SO, HE DON'T HAVE ACCESS TO CARE.

144) The Defendant DR YUNA (DENTIST AND DR KORANDY (FHSO) AND THE DR KOENIGSMANN & D'SILVA KNOW PERFECTLY THAT ABREU SUFFER OF A MOUTH GUM DISEASE & INFECTIONS IN NEED OF DENTAL CLEANING EVERY 90 DAYS (3 MONTHS) THAT HE IS IN REGULAR & CONSTANT PAINS & THAT HE IS IN NEED OF STRONG PAIN MEDICATIONS FOR HIS TOOTH but they has DENIED ABREU SUCH DENTAL & MEDICAL TREATMENTS AND WONT ONLY TO TAKEN OFF ALL ABREU TOOTH because they DONT WONT TO CLON ABREU MOUTH / TOOTH. THEY DONT WONT TO PROVIDE ABREU WITH GOOD DENTAL TOOTH PASTER & GOOD TOOTH BRUSH. THE TOOTH BRUSH & TOOTH PASTER PROVIDED TO ABREU IN THE SITUATION ARE INADEQUATE & INAPPROPRIATE AND FOR THIS REASON ABREU IS NOW ALSO SUFFERING OF A GUM DISEASE & INFECTIONS. ALSO THE DEFENDANT MS D'SILVA DENTAL DIRECTOR IN DOCS CENTRAL OFFICE IN ALBANY HAS IGNORED ABREU COMPLAINTS IN THIS ISSUE & MATTERS & FAILED TO RESOLVE THEM & ACTED AWO OF A FORM DELIBERATE & INDIFFERENT TO ABREU MULTIPLE LETTERS COMPLAINTS & GRIEVANCES

145) All this lack of the defendants between WARD SULLIVAN & GREAT MEADOW CK along with all AND lack of the defendants between DOCS ALBANY CENTRAL OFFICES & OMH & CNY PE HAS CLEARLY VIOLATED ABREU CONSTITUTIONAL RIGHTS AND CONTINUE VIOLATED ABREU RIGHTS TO THE PRESENT WORKING IN AN OPEN CONSPIRACY & IN RETALIATIONS EACH OTHER OPENLY AGAINST MR ABREU, VIOLATED SO ABREU 1ST 4TH 8TH & 14TH AMEND RIGHTS, THE 18 USC § 241 - § 242, 18 USC § 1519, 18 USC § 12417, 18 USC 14141 & 18 USC § 1391(b), 18 USC § 1091, § 28 USC § 509 B, AND "THESE CLAIMS ALL FROM WARD SULLIVAN & GREAT MEADOW CAN BE JOINED PURSUANT TO FED R CIV P 18 § 20(a)" AND UNDER THE ARTICLE III OF THE U.S. CONSTITUTION. § 3106

146) THE DEFENDANT WILSON HAS FROM OCTOBER 2015 TO THE PRESENT JULY / 2016 HARASSED INTIMIDATED RETALIATED AND DISCRIMINATED TO MR ABREU, HAS WRITTEN FAISE TICKETS AND REPORTS AGAINST MR ABREU, HAS MAKE COORCATEDS CAMPAIGNS OF CELL SEARCHES INSIDE OF ABREU CELLS, MISHANDLED ABREU LEGAL MATERIALS. THROWING ABREU CARBONS- PAPERS ENVELOPES AND WRITING PAPERS THROWING ABREU PERSONAL CORRESPONDANCE CHRISTMAS CARDS FROM ABREU FAMILY THROWING ABREU RELIGIOUS MEALS VIOLATED ABREU RELIGIOUS MEALS REASED TO FEEDING ABREU HIS RELIGIOUS MEALS, HAS CALLED FUCKING PERVERT AND OTHERS MANY NICKNAMES DONT ALLOW TO THE MEDICAL NURSES TO THE COUNSELORS AND SOCIAL WORKERS TO ARRIVE FRONT ABREU CELLS WHEN HE WORK IN THE SITE HAS ALSO DENIED TO ABREU HIS RIGHTS TO 'RECREATIONS SITOWERS AND CELL CLEANINGS ALSO OF TIME' & DENIED ABREU MULTIPLE TIME HIS RIGHTS ~~GET~~ SUPPLIES IN THE SITE. AND REGULARLY TO CONSPIRE AGAINST ABREU along with other staff & DEFENDANTS MR IVER AND SYT. BOICAR.

147) ON June / 28 / 2016 HE CONDUCTED A CELL SEARCH IN ABREU CELL MISHANDLED ABREU LEGAL PAPERS & PERSONAL PROPERTIES AND TOOK ALL ABREU RELIGION FOODS AND EYE GLASSES CASE ON June / 29 / 2016 HE CONDUCTED ANOTHER CELL SEARCHES. IN ABREU HE TOOK ABREU WRITING PENS AND OTHER ITEMS & MISHANDLED ~~again~~ ABREU LEGAL WORKS / DOCUMENTS. ON June / 30 / 2016 HE CONDUCTED ANOTHER CELL SEARCH WHILE ABREU WAS IN THE SHOWER HE TOOK ABREU CELL WHITE DUCKET THE WHICH ABREU NEED FOR CAN CLEAN HIS CLOTHES. & CLEAN AND AGAIN MISHANDLED ABREU LEGAL MATERIALS ON JULY / 05 / 2016 HE AGAIN CONDUCTED ANOTHER CELL SEARCH WHILE ABREU WAS IN THE SHOWER AND HE ALSO DENIED ABREU HIS LUNCH MEALS. (DENIED ABREU HIS FOODS.)

148) The Defendant Weston Regularly go inside of Abreu cell every time MR Abreu Has a call-outs appointments Hearings Shows interview let out of his cell, ON JULY 101/2016 HE DENIED Abreu Shower (taken shower OR take his shower) ON JULY 104/2016 C.O. WESTON observed Abreu writing this lawsuit / COMPLAINT. HE 'SAW HIS NAME AND THE NAMES OF OTHER STAFF IN GREAT MEADOW CF, AND HE GO CRAZY MAD ABOUT AND HE STARTED TO THREATENING Abreu, TELLING TO Abreu THIS IS MORE BETTER IF YOU TAKE MY NAME OUT OF YOUR LAWSUIT AND STOP OR WRITING AGAINST ME GRIEVANCES AND COMPLAINTS AND AGAIN OTHER STAFF AND MR IVER. I REALLY LIKE THAT GUY 'SO, THERE WILL BE RE-THALIATIONS AGAINST YOU. HE CONTINUE THREATENED Abreu FROM HIS CELL LIKE FOR HALF HOUR AFTER THE LUNCH TIME.

149) NEXT DAY ON JULY 105/2016 WHILE Abreu WAS INSIDE OF THE SHOWER IN THE UNIT THE C.O. WESTON GO INSIDE Abreu CELL, LOOKING FOR Abreu LAWSUIT (THIS COMPLAINT) FOR TO TAKE IT OR DESTROY IT. BUT Abreu HAS PASSED HIS LAWSUIT / COMPLAINT TO HIS NEIGHBOUR (IN F-127 CELL) BECAUSE Abreu FEELING I ASSUMED THAT C.O. WESTON WILL DO SO. WHILE Abreu WAS IN THE SHOWER IN THE MORNING THE C.O. WESTON HE GO INSIDE Abreu CELL, THROW ALL Abreu LEGAL PAPERS IN THE FLOOD MISHANDLED IT, PAPERS BY PAPERS. HE APPEARED THAT HE WAS LOOKING FOR SOMETHINGS. HE TOOK ALL Abreu ASTHMA INHALERS HE BRING TO THE NURSE MS. M. VONORDER INSIDE OF Abreu CELL SHE & C.O. WESTON WERE INSIDE Abreu CELL. **DUE** SEVERAL MISCONDUCTS AGAINST Abreu CELL PROPERTIES AND LEGAL MATERIALS AND ITEMS. THE SHOWER AND TOILET WERE TURNED OFF TO

150) THE C.O. WESTON HAS ADVISED TO THE DEFENDANT VON ORDER THAT HE SAW HER NOME AND IN THE LAWSUIT/COMPLAINT. SEVERAL INMATE WITNESSES IN THE SHU THEY SAW TO C.O. WESTON AND RN VONORDER INSIDE OF ABREU CELL. FOR SEVERAL MINUTES - AND SEVERAL INMATES IN THE UNIT WERE THINKING THAT THEY WERE HAVING SEX INSIDE OF ABREU CELL BECAUSE THEY WERE HEARING AND LISTEN TO 'RN. VONORDER SAYING OH MY GOD OH, MY GOD AFTER 'WHEN SHE GOT OUT OF' ABREU CELL SHE WAS SAYING TO C.O. WESTON VERY LOUDED OH ABREU HAVE AN SMALL 'DICK' ITA, ITA ITA THEN C.O. WESTON ADDED LISTEN 'HE IS IN THE SHOWER RIGHT NOW - I WILL GO TO COVER UP HIS DOOR THE SHOU' SO HE COVERED UP THE SHOWER DOOR WITH A BIG REED UP CORT MADE OF METAL COVERED UP THE ENTIRE DOOR. THEN WHEN C.O. WESTON ESCORTED ABREU BACK TO HIS CELL, HE WAS THREATENED ABREU AND WHEN HE WAS REMOVED ABREU HAD CUTS, HE USED USE OF FORCE AND INJURED ABREU BOTH HANDS & WRIST. HE DENIED ABREU MEDICAL CARE. THE RN VON ORDER, SHE DENIED ABREU SICK CALL SERVICES TOO.

151) ABREU SUBSTAINED INJURIES SUCH AS BRUISES CUTS AND A LOT OF PAINS & PROBLEMS FOR MOVE HIS HANDS & WRISTS. ABREU ASKED 'SICK CALL' SLIPS. REPORTED HIS INJURIES AND STRONG PAINS BUT HE WAS DENIED OF SICK CALL SERVICES BY THE RN VON ORDER & C.O. WESTON WHO WAS ALSO ACCUSED TO SHE AGAIN ON 7/06/2016. C.O. WESTON WROTE A FALSE REPORT TRYING TO COVER UP THE INCIDENTS. ALSO ABREU REPORTED THE INCIDENTS TO THE DEFENDANTS BASQUE MILLER WILLIAMS IVER EASTMAN, TELESKO AND (CLEVELAND, AND BYARS AND VIADYKA, & THOMAS & PROCK IN HIS ROUNDS ON 7/05/2016, 7/06/2016 & 7/07/2016 THEY IGNORE ALSO ABREU COMPLAINTS, DENIED MEDICAL CARE AND REFUSED TAKE PHOTOS OF INJURY

152) THE DEFENDANTS BROWN, HAMILTON, MEYER, KENNAN, LUCAS, MOORE, HODGES, LEMAKO, BLOKE, AMBROSOLI, BOZER, KILLINGER, KUA, BUKOWSKI, FINK, FUCINA, FURLANI, GODFREY, GORNY, GROBEN, HEORÍ, HILL, LEUTHE, LEVITT, LITSON, PACKER, RIVERA, HOGGERTI, ROBINSON, BEEBE, WESTON, HILTON, REDDING, GROUT, IVER, PAL, JACKSON, POOLANO, KERANDY, THOMAS, BRUN, BANCHE, NABOZNI, DEPALO, GONYEA, MELECC, MR EASTMAN, MILLER, CLEVELAND, HORRIS, KOENIGSMANN, MR JACKSON, C. JACKSON, WILLIAMS, BIRRELL, SCANLON, VLADYKA, LOWRY, BYERS, LEONARD, KELLMAN, PRACOCK, BURNETT, KERR, G. WILLIAMS, SZABICK, CONNOLLY, WYZV KOWSKI, SOLA, LITSON, BOAL, C. MORRIS, MONTES, D. SILVA, MCCARTHY, WINNEY, CHIEF OF OSI, SCHUMACHER, STIRK, STUBOWZ, ADAMS, TOPORNIK, WAHR, ROMON, SKUBIS, MAVER, HAWK, MCGUIRE, HERAZIK, ROBERTS, WHITE, JOHNSON, JENTZ, URBAN, VASQUEZ, S. SIMMONS, WILSON, ASH, VOLMER, HYLAND, PRACK, D. VARETTOZZI, CROWLEY, BAILLANT, HALL, HOLWOOD, ARLISS, DIAZ, EGGLE, SIDOROWITZ, SULLIVAN, TELESKO, BOICE, EVONS, FREEMAN, REID, KRYGIER, HERBINSON, MAGYOR, GREGOIRE, LUCAS, GORZI, FERROW, HEIF, LA PENNA, DAVIS, LOBELZ, HAYDEN, MCKAY, MENNING, BASCO, K. ROSPLOCK, LIPKA, HAVENS, ROGUE, LOFFSCH, PINK, LECLAIRE, BRUNELLE, VAN ORDER, WATKINS, A. SULLIVAN, MCCULLACH, BERNSTEIN, EATMAN, YONDER, FINE, HOLMAN, MONTES, KUINLON, NEW YORK STATE, N.Y. OMH AND N.Y. DOCS. HAS CLEARLY VIOLATED AGREEMENT THE PLAINTIFF 1ST, 4TH, 8TH, AND 14TH AMEND RIGHTS U.S. CONSTITUTION, THE AIR ACT, THE HUMAN RIGHTS, THE INTERNATIONAL LAWS, THE JMW BILLS, THE HEALTH SERVICES LAWS, THE ADA AND REHABILITATION ACT AND THE TITLE II, THE BILL 4701, N.Y. ASSEMBLY BILL A 9939, THE PREA LAW, THE GENDER MOTIVATED VIOLENCE ACT, THE ICCPR ARTICLE 7, ICESCR, ARTICLE 12, THE UNITED NATIONS STANDARD FOR THE TREATMENT OF PRISONERS & THE BODY OF PRINCIPLES FOR THE PROTECTION OF ALL PERSONS UNDER ANY FORM OF DETENTION OR IMPRISONMENT & THE MANUEL LOU, WITH THEM HUMAN ACTS, ABUSE, CONSPIRACY, RAPIDES & DISCRIMINATIONS AGAINST CARLOS AGREU.

CLAIMS FOR RELIEF (RELIEF REQUESTED)

WHEREFORE, PLAINTIFF REQUESTS THAT THE COURT GRANT THE FOLLOWING RELIEF:

A) ISSUE A DECLARATORY JUDGMENT STATING THAT:

- 1) THE DEFENDANTS VIOLATED THE PLAINTIFF RIGHTS UNDER THE 1ST 4TH 8TH AND 14TH AMENDMENT RIGHTS, AND VIOLATED THE DUE PROCESS, CRUEL AND UNUSUAL PUNISHMENT, UNUSUAL OR UNLAWFUL SEARCH AND PAT FRISK, RELIGION RIGHTS, DOUBLE JEOPARDY, THE EXPOST FACTO LAW OF THE U.S. CONSTITUTION(S), AND HUMAN RIGHTS.
- 2) THE DEFENDANTS VIOLATED THE PLAINTIFF RIGHTS UNDER THE FEDERAL LAWS THE APA, THE ADA AND REHABILITATION ACT, AND OF THE GENDER MOTIVATED VIOLENCE ACT (GMVA) AND PREA LAW, BILL A9939 ^{N.Y.} ASSEMBLY
- 3) THE DEFENDANTS VIOLATED THE PLAINTIFF RIGHTS UNDER STATE AND FEDERAL REGULATIONS, DIRECTIVES AND POLICIES AND OF THE DOCS AND OMH, § SHU bill § BILL 4401

B) ISSUE AN INJUNCTION ORDERING DEFENDANTS TO REMOVE THE ALEXIGLASSER/CELL SHIELDS FROM ABREN CELL DOOR TO ALLOW TO ABREN TO CLEAN HIS CELL TOILET, SINK, AND ENTIRE CELL, TO PROVIDE ABREN A CELL BUCKET AND HOT WATER AND CLEANING SUPPLIES, TO TERMINATE THE DEPRIVATIONS AND SPECIAL CONTROL SUIT AND SIGN/DOGUE EXPOSER AND REMOVE IT FROM HIS CELL DOOR SUCH AS UNCONSTITUTIONAL, UNLAWFUL AND ILLEGAL.

C) Issue an Injunction ordering the Defendants or their Agents or their successors in office, employees and all other persons acting in concert and participation with them

- 1) to provide Abreu with his pain medications, hand brace, hand support / back brace, orthopedic boots, his eye glasses with straps, ointments - his lotions / creams for dry skins, his nasal sprays, and all necessary surgeries in his right hand, right arms and / or ordered all new tests and examinations including but not limited to MRI, scan - scan.
- 2) to provide Abreu with all T-R, meds, and treatments for his tuberculosis, and medicines and finish the treatments.
- 3) provide Abreu with all necessary physical therapy for his right hand, lower back, neck and left foot / ankle.
- 4) Allowed to Abreu to use and have and keep his orthopedic boots in the jail, for all callout, recreations, visits & interviews.
- 5) to provide Abreu with his psychiatric meds / medicines stop to discontinued Abreu meds / medicines to provide Abreu with all necessary mental health care treatments & programs, evaluations and examinations.
- 6) to provide Abreu with access to sick call services stop / cease of denying Abreu sick call service, stop / cease the retaliations, and discriminations from medical staff nurses & doctors.

D) ISSUE AN INJUNCTION ORDERING THAT ALL TICKETS / REPORTS HEARINGS AND SENTENCES BE ~~EXPUNGED~~ FROM ABREU RECORDS

1) ORDERING THE DEFENDANTS TO STOP OR VIOLATED ABREU RELIGION AND RELIGIOUS BELIEFS AND FOODS

2) ORDERING THE DEFENDANTS TO PROVIDE ABREU BACK WITH A CAD KOSHER MEALS / FOODS, AND/OR THAT ABREU BE ALLOWED TO CHOOSE BETWEEN A CAD KOSHER TO A HOT KOSHER, SUCH AS TO GO GREEN HEAVEN.

3) ORDERING THE DEFENDANTS TO STOP THE RESTRICTED DIETS / LOCKS AGAINST ABREU AND PROVIDE ABREU PROPER, ADJUSTED AND NUTRITIVE DIETS.

4) ORDERING TO THE DEFENDANTS THAT WHEN ABREU IS PLACED IN LOCKS OR DIETS THAT ABREU / BLOOD PRESSURE WEIGHT OBSERVATIONS TAKE AND MONITORING ABREU HEALTH BE CONDUCTED DAILY SUCH AS MONITORED & REQUIRED THE DOCS REGULATIONS, POLICIES MONITOR / DIRECTIVE

5) ORDERING TO THE DEFENDANTS TO RETURN BACK TO ABREU TO MENTAL HEALTH LEVEL 1 BECAUSE THIS WAS REMOVED ONLY IN REVOLUTIONS AND IN BAD FAITH & INTENTIONALLY WITH THE ONLY PURPOSE OF HORM TORTURE AND TO PUT TO ABREU TO SUFFER FOR LONGER MONTHS

6) ORDERING TO THE DEFENDANTS TO RETURN BACK ALL ABREU LEGAL MATERIALS, PAMPHLETS, LEGAL BOOKS TO PROVIDE ABREU WITH ACCESS TO THE LAW LIBRARY, COURTS, LEGAL SUPPLIES, POSTAGES & LEGAL COPIES.

E) ISSUE ON INJUNCTION ORDERING THE DEFENDANTS, TO PAY TO ABREU WITH ALL DAMAGES, TO PERSONAL PROPERTIES, LEGAL MATERIALS AND MISSING & LOSS OR DESTROY OR PERSONAL PROPERTIES AND LEGAL MATERIALS.

1) ISSUED AN INJUNCTION ORDERING THE DEFENDANTS TO TRANSFER ABREU 27 BOGS OR LEGAL PROPERTIES / MATERIALS TO ANY SITU, AND PRISON, THAT ABREU BE TRANSFERRED IN THE FUTURE AND ALLOW TO ABREU, TO KEEP AND HAVE & RECEIVE SUCH LEGAL MATERIALS AND PAPERS OR ALL HIS ACTIVE CASES NECESSARY TO HIS LAWSUITS, APPEALS, PROCEEDINGS & ACTIONS.

2) ISSUED ON INJUNCTION ORDERING ALSO TO DEFENDANTS TO PROVIDE ABREU WITH COUNSELLING AND MENTAL HEALTH SERVICES IN THE SITU THAT COUNSELLOR WINNEY MCCORTAY COLLINGS AND PEACOCK STOP & CEASE THEIR DISCRIMINATIONS, RETALIATIONS AND TREATMENTS DIFFERENTS BETWEEN ABREU & OTHERS SITU INMATES.

3) ISSUED ON INJUNCTION ORDERING TO THE DEFENDANTS TO STOP & CEASE OR PLACED ABREU ONLY IN THE LAST CELL OR THE GALLERY / COMPANY OF THE SITU WHERE NO ONE TO WALK AND WHERE ARE REGULARLY DENIED ALL SERVICES & CONTACTS WITH STAFF IN THE SITU TO ABREU, AND THAT ABREU BE PLACED IN THE FRONT OR MIDDLE OF THE SITU GALLERIES WHERE HE CAN BE APPROPRIATELY MONITORED WHERE HE CAN RECEIVE SICK CALL SERVICES HAVE CONTACTS WITH MEDICAL & MENTAL HEALTH STAFF & COUNSELLORS & OTHERS SITU SERVICES.

- 4) ISSUED ON INJUNCTION ORDERING TO THE DEFENDANTS TO PLACE & PUT VIDEO CAMERAS RECORDS & AUDIOS IN THE MITHU OBSERVATION CELL, FOR SO, AVOID FUTURE PHYSICAL & SEXUAL ASSAULTS.
- 5) ISSUED ON INJUNCTION ORDERING TO THE DEFENDANTS TO PLACE AND PUT TO MR. ABRAHAM BETTING HAND VIDEO CAMERAS FOR ALL COME-OUT OUTSIDE OF HIS CELL FOR ALL MOVING APPOINTMENTS & HEARING OUT OF THE SITE VIDEO CAMERAS. (IN OTHER WORDS WHEN ABRAHAM IS IN THE SITE, HE IS UNDER VIDEO CAMERAS & AUDIOS 24 HOURS, SEVEN (7) DAYS TO TWO WEEKS, BUT WHEN HE IS ESCORTED OUT OF THE SITE, BY GUARDS THEN HE IS NO MORE UNDER THE PROTECTIONS OF THE VIDEO CAMERAS & AUDIOS.)
- 6) ISSUED ON INJUNCTION ORDERING TO THE DEFENDANTS TO PROVIDE ABRAHAM PROTECTIONS SECURITY AND SAFETY & HEALTH CARE, (WELLBEING & WELFARE) IN THE SITE (S), TO STOP & CEASE THE RETALIATIONS, DISCRIMINATIONS, HARASSMENTS, ABUSE & TORTURES AND TO PROTECT ABRAHAM FROM PHYSICAL ASSAULTS, INJURIES AND SEXUAL ASSAULTS.
- 7) ISSUED ON INJUNCTION ORDERING TO THE DEFENDANTS TO PROVIDE ABRAHAM WITH ALL HIS FOIA REQUEST FOR PRESERVATIONS REVIEW & TRU RECORDS, AND STOP/CEASE OF DENIED ABRAHAM HIS FOIA REQUEST & STOP OF NOT RESPONDED OR ANSWERED TO ABRAHAM FOIA REQUEST & APPEALS IN FACILITY LEVELS & CENTRAL OFFICE LEVELS.

F) ISSUE ON INJUNCTION ORDERING TO THE DEFENDANTS TO Place a per locked secured mail box of grievance box in the SHU TO MONITOR TO THE SHU COS of STAFF who PICK UP THE OUTGOING MAILS of FACILITY CORRESPONDENCES

1) ISSUED ON INJUNCTIONS ORDERING TO THE DEFENDANTS TO CONDUCT DENTAL (coming in Abren MONTH EVERY 3 MONTHS (90 DAYS) FOR TO FIGHT HIT GUM DISEASES & INFECTIONS & TO PROVIDE Abren WITH STRONG PAIN MEDS FOR TO FIGHT THE PAINS IN HIS TOOTH & PROVIDE Abren WITH all necessary medical AND DENTAL TREATMENTS & CARE, INUSE ALSO PROVIDED Abren WITH GOOD TOOTHBRUSH AND GOOD TOOTH PASTE THAT HELP Abren TO FIGHT THE DISEASE AND INFECTIONS TOO

2) ISSUED ON INJUNCTIONS ORDERING TO THE DEFENDANTS TO FILE CRIMINAL CHARGES AND ARREST TO THE STAFF/GUARDS who HAS PHYSICALLY AND SEXUALLY ASSAULTED TO Abren (AND) THOSE who HAS COVERED UP THOSE ASSAULTS TO DISCIPLINE TO THEM & TO DISCHARGE TO THEM FROM THE DOCS/OMH

3) ISSUED ON INJUNCTION ORDERING TO THE DEFENDANTS TO CHANGE Abren OMH THERAPIST AND PSYCHIATRIST IN THE SHU. AND TO REMOVE FROM THE SHU TO THE OMH CLINICS MR IVER MS MCCARTHY AND MS POE. AND ASSIGN TO OMH CLINICIANS who FOLLOW THE SHU BILLS THE PRIVATED COURT SETTLEMENTS IN PEOPLE V. FITCHER ETAL. DOCKET# 11CV2694 (SDNY) AND DAI V. OMH/DOCS. SDNY. THE LAWS AND THE CONSTITUTIONAL RIGHTS OF PRISONERS IN THE SHU,

WHEREFORE, PLAINTIFF RESPECTFULLY DEMAND JUDGMENTS:

A) DEMAND FOR PUNITIVE DAMAGES. THE ACTIONS OF THE DEFENDANTS DESCRIBED ABOVE WERE EXTREME AND OUTRAGEOUS. AND SHOCK THE CONSCIENCE OF A REASONABLE PERSON. THEREFORE AN AWARD OF PUNITIVE DAMAGE IS APPROPRIATE TO PUNISH THE DEFENDANTS FOR THEIR CRUEL AND UNCIVILIZED CONDUCT.

B) THE PLAINTIFF HEREBY DEMAND A TRIAL BY JURY OR A TRIAL WITH A JUDGE OR A MAGISTRATE JUDGE

C) DECLARATORY JUDGMENT THAT THE ACTS, POLICIES AND PRACTICES OF THE DEFENDANTS SUCH AS eg 42 USC § 1983 - DELIBERATE INDIFFERENCE TO PLAINTIFF'S MEDICAL AND MENTAL HEALTH NEEDS. CRUEL AND UNUSUAL PUNISHMENT. INTERFERENCE WITH LEGAL RIGHTS; DEPRIVATION OF DUE PROCESS; FAILURE TO INTERVIEW; EQUAL PROTECTION; FREE EXERCISE OF RELIGION; RETALIATIONS; DISCRIMINATIONS. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS UNDER NEW YORK COMMON LAW. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS UNDER NEW YORK COMMON LAW. BATTERY UNDER NEW YORK COMMON LAW. FALSE IMPRISONMENT UNDER NEW YORK COMMON LAW. CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS UNDER 42 USC § 1985. VIOLATED THE PLAINTIFF RIGHTS UNDER THE UNITED STATES CONSTITUTION. SEE ALSO HUMAN RIGHTS TREATIES, 63 FR 68991 (EXECUTIVE ORDER 13107)

D) AWARDING PLAINTIFF DAMAGES AS A RESULT OF DEFENDANTS DELIBERATE INDIFFERENCE TO PLAINTIFF'S MEDICAL AND MENTAL

Health needs, cruel AND unusual punishment, interference with legal mail, deprivation of due process, failure to intervene, violation of the Equal Protection Clause, violation of Plaintiff's right to free exercise of religion, retaliation, intentional infliction of emotional distress, assaults, sexual assaults, battery, false imprisonments, false tickets, reports, AND CONSPIRACY, campaign of Harassments, AND DISCRIMINATIONS, interference with access to the courts, AND law library & legal materials, legal personal, legal books, legal papers, legal books, in an amount to be determined at trial plus punitive damages OR in the alternate compensatory damages AND punitive damages in the amount of \$ 25,000,000, (25 millions of dollars) from the defendants individually AND OFFICE CORRELATES, including to the State of New York AND this agency DOES OMH CNYC for the violations of the ADA AND Rehabilitation Act; PREA law AND the Gender Motivated Violence Act (GMVA) & Assembly Bill 4401/BILL 999A

E) Awarding Plaintiff fees AND costs, AND disbursements

F) Appointment of Probable Counsel in this action pursuant to 28 USC § 1915

G) Granting Plaintiff such other AND further relief as the court deem just & proper

Dated July 04/2016
Washington County New York



CARLOS ADREN

VERIFICATION

STATE OF NEW YORK
(COUNTY OF WASHINGTON) IS


CARLOS ABREU # 99A3027 being
DULY SWORN SAYS:

I AM THE PLAINTIFF ABOVE NAMED
I HAVE READ THE FOREGOING COMPLAINT
AGAINST ALL THE DEFENDANTS AND KNOW
ITS CONTENTS THE SAME IS TRUE TO MY
BEST KNOWLEDGE EXCEPT AS TO THE
MATTER THEREIN STATED TO BE ALLEGED
ON INFORMATION AND BELIEF AND AS
TO THOSE MATTERS I BELIEVE THEY AND IT
TO BE TRUE


CARLOS ABREU
PRO-SE
GREAT MEADOW / STATE

PURSUANT TO 28 USC § 1746 I DECLARE
UNDER PENALTY OF PERJURY THAT THE
FOREGOING IS TRUE AND CORRECT.

EXECUTED: ON 7/07/2016


CARLOS ABREU
99A3027
PRO-SE
GREAT MEADOW CT
BOX 51
COMSTOCK N.Y. 12821

07/07/2016

TO: Hon. ELIZABETH A WOLFORD
 U.S. DISTRICT COURT Judge
 Western DISTRICT OF NEW YORK
 100 STATE STREET
 ROCHESTER, N.Y. 14614-1309

FROM: CARLOS ABREU
 # 99A3027
 SHU FL-29 CELL
 GREAT MEADOW CR
 BOX 5/
 CONESTOGA, N.Y. 12821-0051

SUBJECT: "AMENDED COMPLAINT"
 Re: ABREU V. BROWN et al
 DOCKET NO. # 14CV-6599

DEAR Hon WOLFORD:

ENCLOSED PLEASE FIND THE AMENDED COMPLAINT, IN THE ABOVE ACTION SUCH AS YOU HAVE ORDERED PLEASE TO ORDER TO THE CLERK TO FILE & PROCESS THE AMENDED COMPLAINT TO PROVIDE ME THE NECESSARY U.S. MARSHAL FORMS AND THE SUMMONS FOR THE SERVICES OR THE SUMMONS AND COMPLAINTS IN THIS ACTION AND PLEASE TO ASSIGN ABREU / TO ME A PRO BONE COUNSEL WHO CAN TO REPRESENT ME IN THIS ACTION. DUE TO THE SERIOUS OF THE VIOLATIONS, & DUE TO THE LIMITATIONS THAT I HAVE I HAVE ALSO ~~REMOVED~~ REDUCED THE COMPLAINT TO 80 PAGES FROM 260 PAGES THAT WAS THE ORIGINAL COMPLAINT & SUPPLEMENT (MAILED ON 7/07/2016) THANK YOU!
 CLE FILE (28 USC § 1746) CARLOS ABREU